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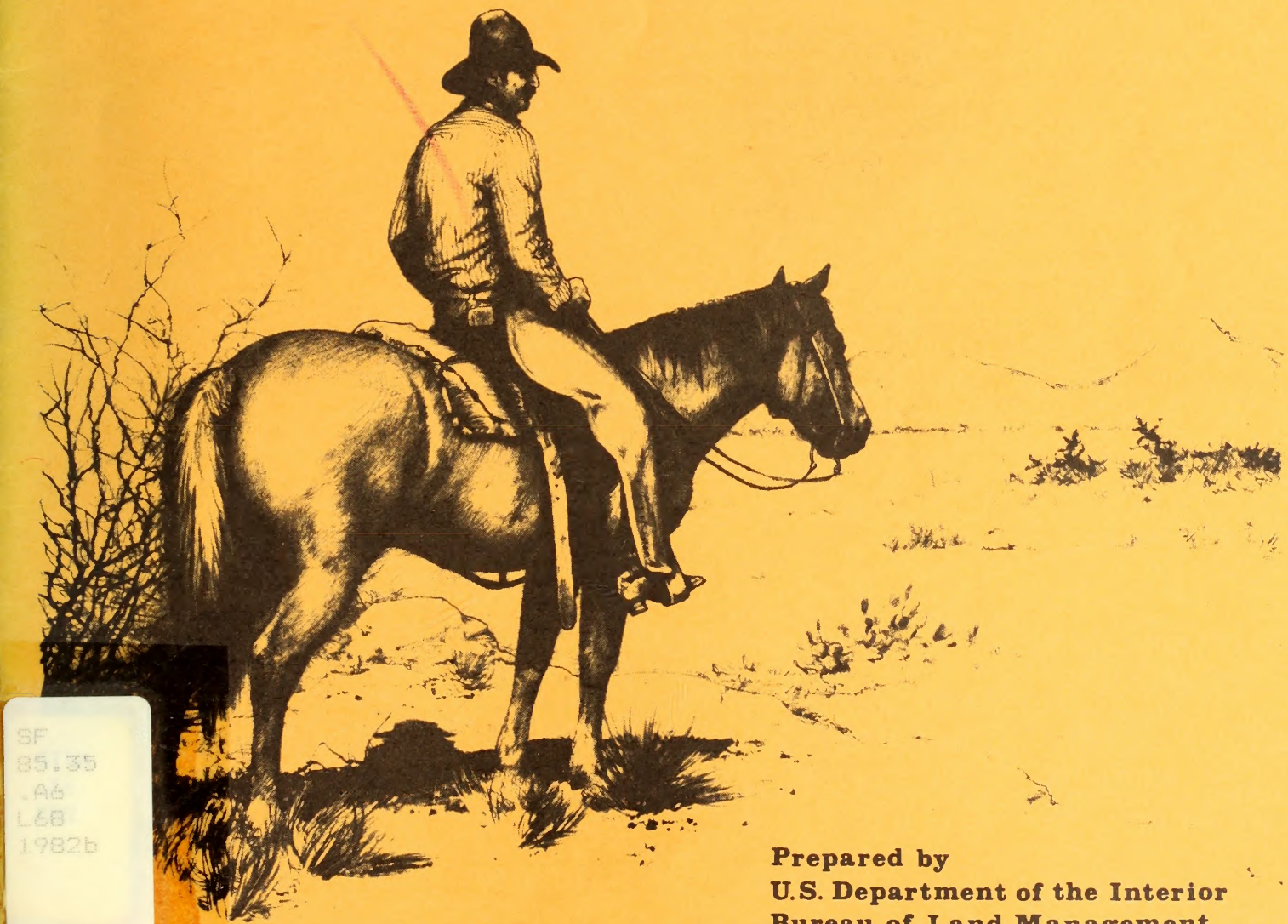
Final Grazing Environmental Impact Statement



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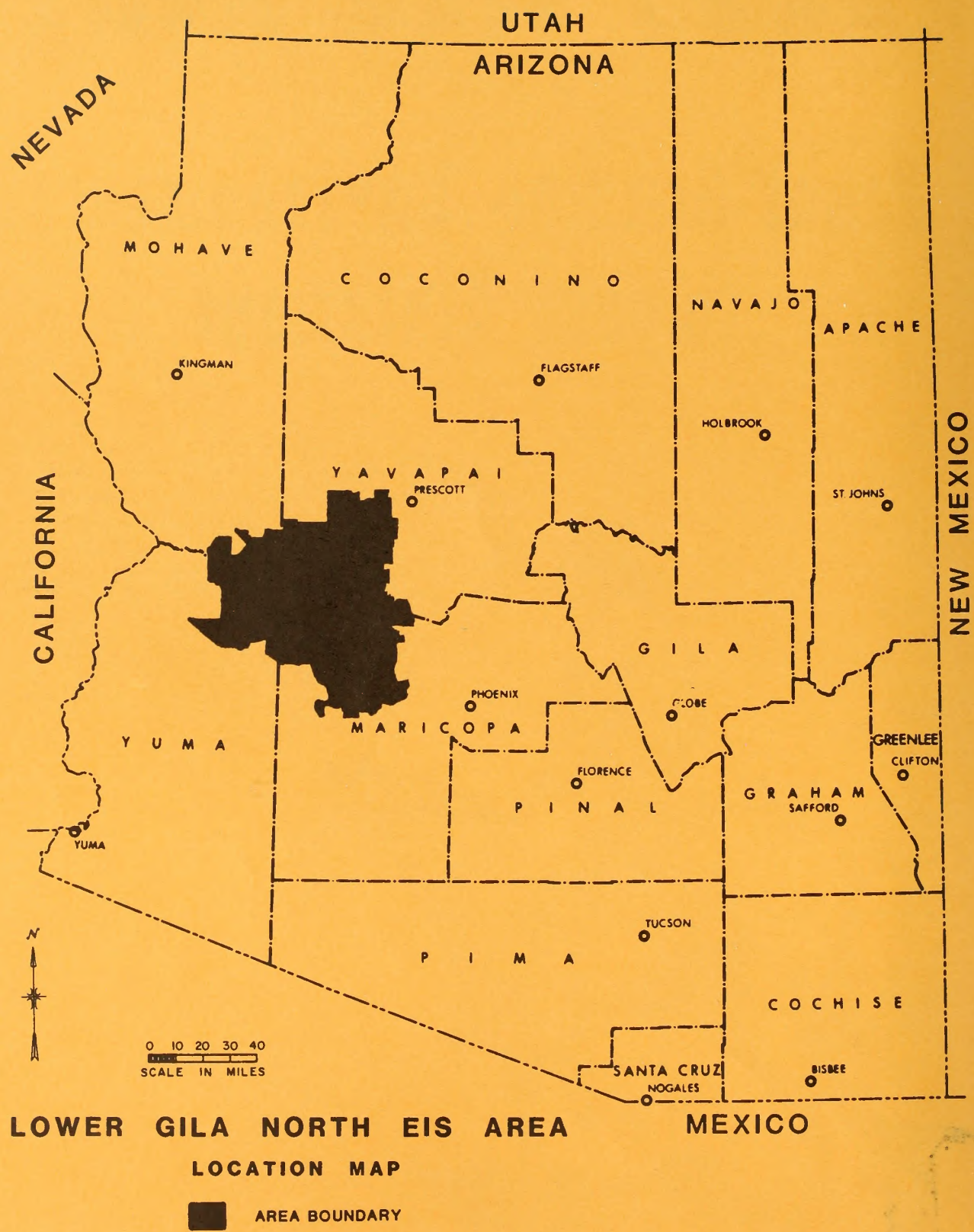
Prepared by
U.S. Department of the Interior
Bureau of Land Management
Arizona



LOWER GILA NORTH EIS AREA

LOCATION MAP

AREA BOUNDARY

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United States Department of the Interior

BUREAU OF LAND MANAGEMENT
ARIZONA STATE OFFICE
2400 VALLEY BANK CENTER
PHOENIX, ARIZONA 85073

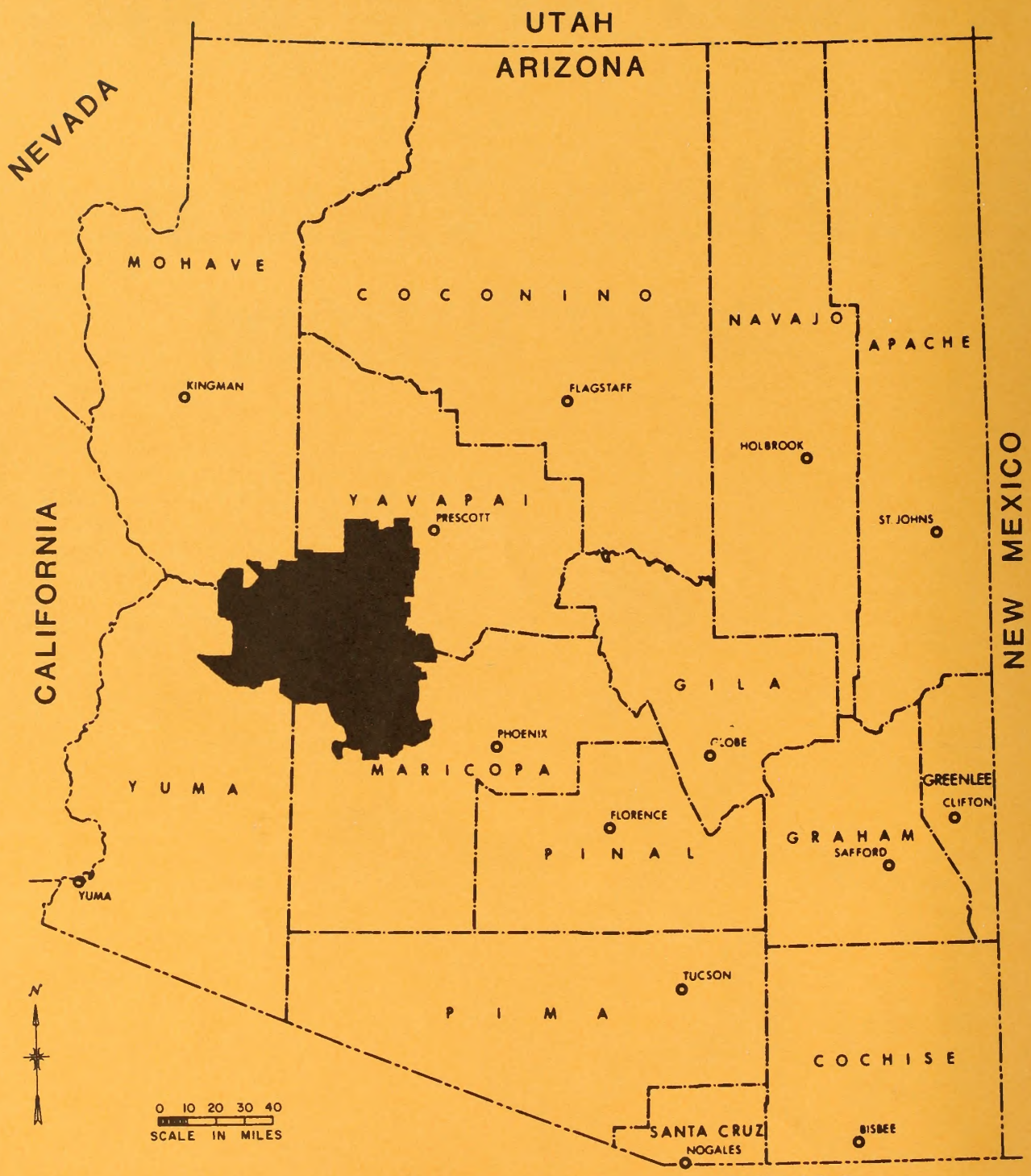
September 1982

Dear Reviewer:

The vegetation production data displayed and used in this EIS were collected during the 1979 and 1980 field seasons, using accepted Bureau methods. These data were needed to help determine areas suitable for continued livestock grazing and to provide the basis for developing a rangeland management program and management alternatives. The vegetation production data have also been used to identify and analyze impacts and mitigation of the proposed action and alternatives. Reviewers of this EIS, however, should recognize the limitations of vegetation inventory data. While these data are adequate for purposes of planning and analysis, they must be supported by the results of monitoring studies before making forage allocation decisions.

D. Dean Bibles
State Director

Bureau of Land Management
Library
Bldg. 50, Denver Federal Center
Denver, CO 80225



LOWER GILA NORTH EIS AREA

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September, 1982

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P. O. Box 25047
Denver, CO 80225-0047

Enclosed is the final environmental impact statement (EIS) for grazing management in the Lower Gila North Planning Area in west-central Arizona. The draft EIS was sent to you earlier. The final EIS consists of a summary of the analysis, comments received on the draft EIS, responses to those comments, and errata. No changes of substance in the analysis of the proposal or its impacts were required by the comments received on the draft statement.

This final EIS should be used with the draft for a full understanding of the analysis, comments, and responses.

This EIS will be used by BLM managers in making decisions affecting the grazing management program on public lands in the planning area. Shortly after the final document is filed with the Environmental Protection Agency (EPA), the Phoenix District Office of the Bureau of Land Management will prepare a Rangeland Program Summary that outlines its broad decisions for rangeland management in the area.

Copies of the summary will be sent to the interested public. Concurrently, the District will begin a consultation process with range users, government agencies, and other parties involved in rangeland management. This consultation will lead to the development of specific decisions for each grazing allotment.

Thank you for your interest in this EIS.

Sincerely,

D. Dean Bibles
State Director

Bureau of Land Management
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Denver, CO 80225

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FINAL
ENVIRONMENTAL IMPACT STATEMENT

PROPOSED GRAZING MANAGEMENT PROGRAM

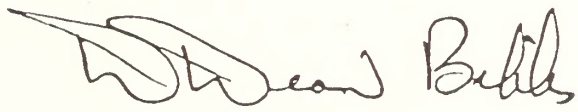
for the

LOWER GILA NORTH EIS AREA

YUMA, MOHAVE, YAVAPAI, AND MARICOPA COUNTIES, ARIZONA

Prepared by

DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
PHOENIX DISTRICT



State Director
Arizona State Office

The Bureau of Land Management proposes to implement a grazing management program within portions of the Lower Gila North Planning Area. The program would allocate vegetation to livestock, big game, and wild burros. The proposal recommends levels of livestock grazing management, identifies needed rangeland developments, and outlines a schedule of implementation. Measures to protect or enhance environmental resources have been incorporated into the program. Alternatives considered in addition to the Proposed Action include Continuation of Present Grazing Management (No Action), Intensive Grazing Management, Seasonal Grazing Management, and Elimination of Livestock Grazing. A concise description of the affected environment and an analysis of the environmental consequences resulting from the Proposed Action and each alternative are provided. Oral and written comments on the draft EIS received during the 60-day review period are also included in the document.

For Further Information Contact: Bill Carter, EIS Team Leader, Phoenix, District,
Bureau of Land Management, 2929 West Clarendon Avenue, Phoenix, Arizona 85017
or call (602) 241-2852.

Date statement was made available to EPA and the public:

Draft — March 19, 1982
Final

SEP 16 1982

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LIST OF AGENCIES, ORGANIZATIONS, AND PERSONS TO WHOM COPIES OF THE STATEMENT WERE SENT

BLM sent copies of the draft EIS and requested comments from all affected grazing permittees, interested individuals, and the following agencies and interest groups:

Federal Agencies

Advisory Council on Historic Preservation
Environmental Protection Agency
Department of Agriculture
- Agricultural Stabilization and Conservation Service
- Economics Statistics Service
- Forest Service
- Science and Education Administration
- Soil Conservation Service

Department of Defense
- Corps of Engineers

Department of the Interior
- Bureau of Indian Affairs
- Bureau of Reclamation
- Fish and Wildlife Service
- Geological Survey
- National Park Service

Arizona State Agencies

Arizona Commission of Agriculture and Horticulture
Arizona Department of Health Services
Arizona Department of Library, Archives, and Public Records
Arizona Department of Transportation
Arizona Game and Fish Department
Arizona Natural Heritage Program
Arizona Office of Economic Planning and Development
Arizona Outdoor Recreation Coordinating Commission
Arizona State Clearinghouse
Arizona State Historic Preservation Officer
Arizona State Land Commissioner
Arizona State Parks Board
Arizona State University
Arizona Water Resources Department
Attorney General's Office
Governor Bruce Babbitt
Governor's Commission on Arizona Environment
Museum of Northern Arizona
Northern Arizona University
University of Arizona

Local Agencies

Big Sandy Natural Resources Conservation District
Buckeye-Roosevelt Natural Resource Conservation District
District IV Council of Governments
Maricopa Association of Governments
Maricopa County Board of Supervisors
Maricopa County Extension Service
Maricopa County Planning and Zoning Commission
Mohave County Board of Supervisors
Mohave County Community College
Mohave County Extension Service
Mohave County Library
Mohave County Planning and Zoning Commission
Northern Arizona Council of Governments
Phoenix Public Library
Wickenburg Resource Conservation District
Yavapai College
Yavapai County Board of Supervisors
Yavapai County Extension Service
Yavapai County Planning and Zoning Department
Yuma County Board of Supervisors
Yuma County Extension Service
Yuma County Planning and Zoning Department

Other Organizations

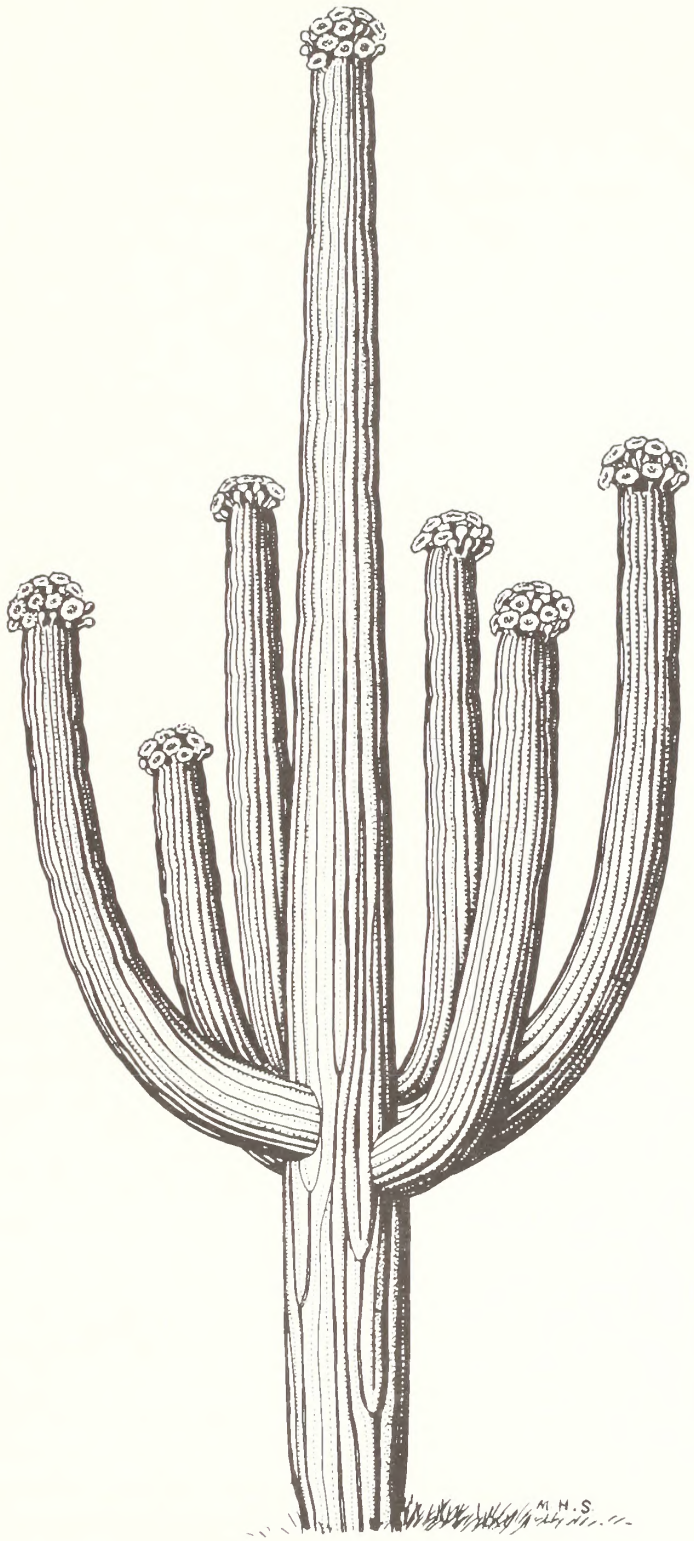
Arizona Cattle Growers Association
Arizona Desert Bighorn Sheep Society
Arizona Farm Bureau Federation
Arizona Fund for Animals
Arizona Livestock Production Credit Association
Arizona Wildlife Federation
Arizona Wool Growers Association
Arizona 4-Wheel Drive Association
Defenders of Wildlife
Desert Donkey and Mule Club
Desert Tortoise Council
Federal Land Bank Association
Grand Canyon Chapter, Sierra Club
Humane Society
International Society for the Protection of Mustangs and Burros
Izaak Walton League of America
League of Women Voters
Maricopa County Farm Bureau Federation
Multiple-Use Advisory Council, Phoenix District
National Audubon Society
National Council of Public Land Users
Natural Resources Defense Council, Inc.
Newspapers
Phoenix-Lower Gila Resource Areas Grazing Advisory Board
Public Lands Council
Public Lands Institute
Save the Mustangs
Society for Range Management
The Maricopa Audubon Society
Wild Burro Protection Association
Wilderness Society
Wild Horse Organized Assistance
Wildlife Management Institute
Wildlife Society
Yavapai County Cattle Growers
Yuma County Farm Bureau Federation

Elected Representatives

Federal
- Representative John J. Rhodes
- Representative Eldon Rudd
- Representative Bob Stump
- Representative Morris K. Udall
- Senator Dennis DeConcini
- Senator Barry Goldwater

State
- Representative Pete Corpstein
- Representative Bob Denny
- Representative Jerry Everall
- Representative John U. Hays
- Representative Cal Holman
- Representative Bill Lewis
- Representative James B. Ratliff
- Senator John C. Pritzlaff, Jr.
- Senator S.H. "Hal" Runyan
- Senator Boyd Tenney

SUMMARY



SAGUARO

SUMMARY

Purpose and Need

The Bureau of Land Management (BLM) proposes to implement a grazing management program for the Lower Gila North Planning Area in Maricopa, Yuma, Yavapai, and Mohave Counties, Arizona. The area encompasses 1,393,000 acres of public land, 847,000 acres of state land, and 442,000 acres of private land.

This environmental impact statement (EIS) responds to requirements of the National Environmental Policy Act of 1969 to analyze the impacts of projects having significant impacts on the environment and to the Federal Land Policy and Management Act's mandate to provide for the orderly use and development of public rangelands and to preserve the land and its resources.

Between 1979 and 1980, BLM completed resource inventories that revealed that public rangelands were producing less than their potential and that important resource conflicts needed to be resolved. A draft land use plan was completed in 1981. It pulled together numerous recommendations into a comprehensive proposal for rangeland management in the planning area. The overall objective of the rangeland management program is to improve the productivity of rangelands and to fulfill social, economic, and environmental needs within the EIS area.

To help "scope" and summarize significant issues concerning the proposed rangeland management program, BLM held a series of meetings and open houses in 1980 and 1981 to get the public involved in the review and analysis of management recommendations. Many of the issues discussed in the EIS have come out of this scoping process.

Upon completion of the EIS, BLM managers will determine what actions will constitute the rangeland management program for the planning area. The decision will respond to the following questions:

- With demand for limited forage often exceeding supply, how many livestock, wild burros, and big-game animals should graze the public lands?
- What level or intensity of grazing management should BLM implement on public lands to achieve management objectives, recognizing the need to weigh resource benefits against economic costs?
- What rangeland developments should be built to support grazing management and to ensure the orderly use of the public rangelands?
- What actions are needed in the program to respond to a wide range of environmental and economic concerns, including preserving sensitive riparian habitats, reducing conflicts in bighorn sheep areas, safeguarding protected plants and animals and their habitats, and stabilizing livestock operations dependent on the public lands?

The decision will consider inventory data, planning objectives, environmental impacts, economic effects, benefit-cost studies, public comments, and BLM policy.

Public Review

BLM filed a draft EIS with the Environmental Protection Agency on March 19, 1982, and distributed the draft to the public for review. A 60-day comment period ended on May 21, 1982. Hearings were held in Wickenburg and Phoenix, Arizona on May 4 and 5, 1982 to receive testimony from the public on the draft statement. Eight individuals testified at the two hearings and 18 letters of comment were received from various agencies, organizations, and individuals.

The public comments and agency review resulted in minor edits, corrections, and clarifications to the text. No changes of substance were required in the draft EIS. An abbreviated final was prepared following Council on Environmental Quality regulations. The final EIS and the draft EIS should be used jointly for a full understanding of the analysis, comments, and responses.

Alternatives and Their Consequences

The EIS analyzes the following five rangeland management alternatives.

1. Proposed Grazing Management *(Proposed Action)*
2. Continuation of Present Grazing Management *(No Action)*
3. Intensive Grazing Management *(Intensive Grazing)*
4. Seasonal Grazing Management *(Seasonal Grazing)*
5. Elimination of Livestock Grazing on Public Land *(No Grazing)*

Table S-1 compares and summarizes the alternatives, and Table S-2 summarizes long-term impacts.

PROPOSED GRAZING MANAGEMENT

Description

The *Proposed Action* corresponds to recommendations for rangeland management in Step 2 of the Lower Gila North Management Framework Plan (MFP) and is BLM's preferred alternative. The proposal recommends actions designed to improve the condition of important riparian areas, enhance critical wildlife habitats, and protect sensitive resources to meet rangeland management objectives.

In response to budget constraints and new rangeland

TABLE S-1
SUMMARY OF ALTERNATIVES

	Proposed Action	No Action	Intensive Grazing	Seasonal Grazing	Ephemeral Option	No Livestock
Proposed Grazing Management Level (Number of Allotments)						
Intensive	10	1	36	1	1	0
Less Intensive	16	0	0	0	0	0
Nonintensive	45*	0	35*	35*	35*	0
Seasonal	0	0	0	35	27	0
Yearlong	0	35	0	0	0	0
Custodial	0	35	0	0	0	0
Ephemeral	7*	7	7*	7*	15*	0
Reserved for Wildlife or Burros	1*	1	1*	1*	1*	79
Initial Forage Allocation (AUMs)						
Livestock	49,051	58,155	49,051	49,051	44,536	0
Change from Authorized Grazing Preference (%)	-16	0	-16	-16	-23	-100
Big Game	9,574	0	9,574	9,574	9,574	9,574
Burros	1,260	0	1,260	1,260	1,260	1,860
Proposed Rangeland Developments						
Reservoirs	0	0	21	0	0	0
Spring Developments	3	0	10	7	7	0
Wells	7	0	38	23	23	0
Pipeline (Miles)	2	0	10	7	7	0
Fence (Miles)	41	0	122	0	0	1,750
Cattle Guards	0	0	0	0	0	150
Gates	0	0	0	0	0	115
Construction Cost ($000)	280.8	0	1,307.6	370.3	370.3	7,651.5
Yearly Maintenance Cost ($000)	3.6	0	28.2	5.8	5.8	90.7
Workmonths Required Above FY82 Level						
Implementation	50	0	90	40	40	40
Monitoring	24	0	40	20	20	20
Benefit-Cost Ratios						
Overall Ratio	1.5:1	N/A**	0.7:1	1.2:1	1.2:1	N/A**
Allotments above 1:1	9	N/A**	9	20	20	N/A**
Allotments below 1:1	0	N/A**	26	0	0	N/A**

* These allotments are combined under the general heading of Nonintensive Management in the narrative to simplify analysis and conform to new BLM policy.

** N/A = Not applicable.

TABLE S-2
IMPACT SUMMARY—20 YEARS AFTER IMPLEMENTATION

Resource Elements	Existing Situation	Proposed Action	No Action	Intensive Grazing	Seasonal Grazing	Ephemeral Option	No Livestock
Vegetation							
Vegetation Production (lbs.)	490,120,000	514,626,000	490,120,000	519,527,000	512,175,000	513,155,000	524,428,000
Plant Cover	NA[1]	Slight Increase	Slight Decrease	Slight Increase	Slight Increase	Slight Increase	Mod. Increase
Rangeland Condition (acres):							
Excellent	26,400	146,000	25,700	149,400	133,400	133,400	150,400
Good	412,500	552,700	412,000	558,500	488,100	488,100	558,800
Fair	713,600	496,600	714,400	492,800	572,100	572,100	492,000
Poor	222,300	179,500	222,600	174,000	181,100	181,100	173,600
Soils							
Sediment Yield (acre-feet/mi^2/year)	0.6[3]	Slight Decrease	Slight Increase	Slight Decrease	Slight Decrease	Slight Decrease	Great Decrease
Acres Permanently Disturbed	NA[1]	9	NA[1]	43	10	10	191
Erosion	NA[1]	Decrease	Mixed	Decrease	Slight Decrease	Slight Decrease	Decrease
Compaction	NA[1]	Slight Decrease	No Change	Decrease	Slight Decrease	Slight Decrease	Decrease
Water Resources							
Consumption by Grazing Animals (acre-feet)	63	68	63	72	69	69	8
Surface Water Quality	NA[1]	No Change	Slight Decline	Slightly Improve	Slightly Improve	Slightly Improve	Improve
Wildlife							
Big-Game Forage (AUMs)	0	11,489	0	12,331	12,179	12,179	15,970
Big-Game Numbers (Public Land):							
Mule Deer	2,800	3,230	2,600	3,490	3,330	3,330	4,440
Pronghorn Antelope	0	0	0	0	0	0	5
Desert Bighorn Sheep	100	140	100	180	180	180	250
Javelina	560	990	740	1,040	990	990	1,040
Wildlife & Habitat Impacts:							
All Wildlife	NA[2]	Mixed	Adverse	Low Benefit	Mixed	Low Benefit	Benefit
Riparian	NA[2]	Low Benefit	High Adverse	Low Benefit	Low Benefit	Benefit	High Benefit
Wild Burros							
Burro Forage (AUMs)	0	1,260	0	1,260	1,260	1,260	1,860
Burro Population	450	210	610	210	210	210	310
Cultural Resources							
Change in Adverse Impacts to Cultural Resources	NA[2]	Mod. Increase	Low Increase	High Increase	Low Increase	Low Increase	High Decrease
Recreation (Visitor Days)							
Big Game Hunting	3,500	4,050	3,350	4,300	4,100	4,100	5,800
Livestock Grazing							
Allocated AUMs (Maximum Allowable on Public Lands)	58,155	53,730	58,155	55,181	52,696	47,651	0
Change from Authorized Grazing Preference (%)	NA[2]	-8	0	-5	-9	-18	-100
Livestock Performance							
14 Small Ranches (0-99 head)							
Calf Crop (%)	79	83	79	83	NA[2]	NA[2]	NA[2]
Steer Calf Weaning Weight (lbs.)	420	468	420	468	NA[2]	NA[2]	NA[2]
Heifer Calf Weaning Weight (lbs.)	365	413	365	413	NA[2]	NA[2]	NA[2]
Cull Cow (%)	17	16	17	16	NA[2]	NA[2]	NA[2]
10 Medium-Size Ranches (100-199 head)							
Calf Crop (%)	76	83	76	83	NA[2]	NA[2]	NA[2]
Steer Calf Weaning Weight (lbs.)	420	468	420	468	NA[2]	NA[2]	NA[2]
Heifer Calf Weaning Weight (lbs.)	365	413	365	413	NA[2]	NA[2]	NA[2]
Cull Cow (%)	16	15	16	15	NA[2]	NA[2]	NA[2]
9 Large Ranches (>200 head)							
Calf Crop (%)	70	83	70	83	NA[2]	NA[2]	NA[2]
Steer Calf Weaning Weight (lbs.)	380	428	380	428	NA[2]	NA[2]	NA[2]
Heifer Calf Weaning Weight (lbs.)	360	408	360	408	NA[2]	NA[2]	NA[2]
Cull Cow (%)	15	14	15	14	NA[2]	NA[2]	NA[2]
Economic Conditions							
Net Revenues ($):							
Small Ranch	5,300	7,220	5,300	7,760	7,620	NA[1]	520
Medium-Size Ranch	12,090	19,940	12,090	20,170	19,760	NA[1]	2,240
Large Ranch	33,810	63,210	33,810	64,690	71,990	NA[1]	3,670
20-Year Net Revenue Value:							
Small Ranch	54,570	62,670	54,570	64,920	73,270	NA[1]	5,370
Medium-Size Ranch	124,460	157,600	124,460	158,610	195,400	NA[1]	23,040
Large Ranch	348,000	472,190	348,000	478,480	702,980	NA[1]	37,740
Ranch Values ($)							
Small Ranch	85,500	84,000	85,500	85,500	85,500	NA[1]	12,000
Medium-Size Ranch	229,000	231,000	229,500	238,500	220,500	NA[1]	55,500
Large Ranch	1,020,000	813,000	1,020,000	831,000	807,000	NA[1]	124,500
Gross Sales Revenue ($)	996,000	1,407,000	996,000	1,448,000	1,893,000	NA[1]	191,000
Operating Expenses ($)	497,000	537,000	497,000	555,000	941,000	NA[1]	128,000
Workyears (%)[4]	23	25	23	26	16	NA[1]	3

[1] NA = Data not available.
[2] NA = Not applicable.
[3] Median value.
[4] Refer to Glossary for definition of a workyear.

policy, BLM would focus on changing management in areas where resources conflict and where BLM has a reasonable opportunity to resolve the conflicts and improve rangeland conditions. The proposal would emphasize favorable benefit-cost ratios for rangeland developments and concentrate limited funds in areas that most need attention and where the greatest gain can be realized. Monitoring would provide data for use in determining if management objectives are being met and on which BLM would base future management changes.

At first BLM would hold livestock grazing to current levels (initial stocking rates), as determined by average licensed use from 1976 to 1980. Stocking at this level would reduce livestock an average of 16 percent from authorized grazing preference. BLM would monitor utilization of key plant species and would change livestock numbers where needed to achieve an average utilization of 50 percent. Supplemental licenses could be issued in years of abundant ephemeral growth. Three levels of grazing management would be implemented throughout the EIS area.

- *Intensive grazing management* would be implemented on nine allotments that show a favorable benefit-cost ratio and potential for increased forage production or where needed to resolve significant resource conflicts. BLM would prepare allotment management plans (AMPs) in cooperation with ranchers and other affected interests. AMPs would describe grazing treatments to increase forage production and improve plant vigor and composition.

- *Less intensive grazing management* would be implemented on 16 allotments where rangeland condition and trend are acceptable and present management is satisfactory. BLM would not develop grazing systems but would specify numbers and kind of livestock, period of use, and rangeland developments for resource management.

- *Nonintensive grazing management* would be implemented on 53 allotments where the potential for increased forage production is low, benefit-cost ratios for intensive management are unfavorable, or small amounts of public land make intensive management impractical. Seven of these allotments would be kept under ephemeral management, and one would continue to be reserved for wildlife habitat.

To implement intensive grazing systems, BLM would build the following rangeland developments at a cost of $280,800: three springs, three wells, 2 miles of pipeline, and 41 miles of fence. BLM would implement the proposal over a 6-year period from 1983 to 1989. The *Proposed Action's* goal is to reach management objectives within 20 years of implementation.

BLM proposes numerous measures for resource protection and enhancement to reduce adverse impacts or resolve resource conflicts. Major recommendations under the *Proposed Action* include the following.

- Remove 100 excess wild burros and maintain an average population of 200 in the Alamo Herd Management Area. Provide burros freedom of movement and access to major waters, and ensure that they have adequate forage.

- Remove wild burros from the Big Horn, Granite Wash, Harquahala, and Little Harquahala Mountains to end conflicts with bighorn sheep, protected plants, and private land use and to prevent further damage to sensitive resources.

- Restore deteriorated riparian habitats by fencing, planting seedlings, implementing rotational grazing, designing habitat management plans, and designating areas of critical environmental concern (ACECs).

- Protect threatened, endangered, and sensitive plants through fencing, reducing utilization, and designating ACECs.

- Provide safe access and year-round water for wildlife at 150 livestock waters.

- Ensure adequate forage for existing numbers of big game. As the rangeland produces more forage, increase big-game forage allocations until desired big-game numbers are reached.

- Reduce livestock-bighorn conflicts by lowering utilization, designing proper grazing systems, and separating bighorns from domestic sheep.

- Reduce competition in crucial desert tortoise habitats by seasonally excluding livestock or designing suitable grazing systems.

Consequences

The *Proposed Action* would have the greatest impact on vegetation, wildlife, livestock grazing, wild burros, and economic conditions and would have slight to no impacts on other resources. Geology, minerals, air quality, climate, topography, urban land use, wilderness values, and social attitudes and values would not be measurably affected. Soils, water, cultural and visual resources, and recreation would be only slightly affected.

Vegetation

Over a 20-year period, the *Proposed Action* would increase vegetation production and percent plant cover and improve rangeland condition. Vegetation production would increase from 490 to 515 million pounds, and overall cover would slightly increase. The greatest increase in cover would occur in the riparian vegetation type (from 52 to 57 percent) and on allotments proposed for intensive grazing. By improving species composition and plant vigor and increasing seedling establishment, the *Proposed Action* would improve rangeland condition. Acres in good condition would increase from 412,500 to 552,700. Trend would improve on intensively managed allotments but would not greatly change on other allotments.

Critical riparian areas would be protected by implementing grazing systems and applying measures for resource protection and enhancement. Cover and key species composition would increase, and condition

would improve.

Livestock Grazing

The *Proposed Action* would at first reduce allowable livestock numbers on public land by an average of 16 percent from authorized grazing preference. Intensive management on nine allotments would require switching from continuous or sporadic grazing to grazing systems with periodic rest and would increase operator workloads and expenses. In addition, livestock would have to change their grazing habits. As rangeland conditions improve on intensively managed allotments, desirable livestock forage would increase, increasing weights and calf crops and reducing death losses.

Wildlife

The *Proposed Action* would significantly change 837,100 acres of wildlife habitat but leave unchanged 555,900 acres. More than 20 years would be needed for most habitat changes, since they are closely tied to vegetation changes.

Game would benefit from improved rangeland condition, increased forage, and decreased competition. In the long term, deer numbers would increase by 430, bighorn sheep by 40, and javelina by 430. Productivity of upland and small-game habitat would increase by 5 percent in the long term, and upland and small game would benefit from new waters and the ecotones formed by the surrounding habitat.

Riparian habitat quality would continue to deteriorate along present trends in the short term, but in the long term, broadleaf trees would replace older decadent trees on 50 percent of riparian habitat, improving its quality for dependent wildlife.

Wild Burros

Burro use would end on three use areas, and burro numbers in the Alamo Herd Area would be reduced from 300 to 200. This burro removal would reduce forage and water competition in crucial wildlife habitat and alleviate problems of trespass burros on residential and farm land. On the other hand, the removal program would cause temporary stress for some livestock, wildlife, and burros and accrue costs in burro monitoring and management. Intensive grazing management on the Santa Maria allotment and measures to protect critical riparian areas could inhibit burro movement and access to some waters.

Economic Conditions

The *Proposed Action* would have both adverse and beneficial impacts on EIS livestock operators. In the long term, annual net revenue for small, medium-size, and large ranches would increase, as would total net revenues over a 20-year period. In the long term, the value of the typical small ranch would decrease by $1,500, the value of the typical medium-size ranch would increase by $2,000, and the value of the typical large ranch would decrease by $207,000. Total operating expenses of all ranches would increase by $40,000, and labor needed to run all ranches would increase by 2 workyears. Total gross receipts for all ranches, however, would increase by $411,000. The *Proposed Action* would not greatly affect the regional economy, in which EIS area livestock grazing plays only a small role.

CONTINUATION OF PRESENT GRAZING MANAGEMENT

Description

The *No Action* alternative is addressed in accordance with BLM policy and Council on Environmental Quality regulations. It proposes no change in present grazing management and would allow livestock numbers to remain at authorized grazing preferences. No forage would be allocated to big game or wild burros, although existing numbers of big game and wild burros would use the EIS area. Wild burro numbers would be held to 610.

Under *No Action*, 35 allotments would continue under yearlong grazing, 1 allotment would be reserved for wildlife, 1 would be managed intensively, and 35 would be custodially managed. Existing rangeland developments would be maintained, but no new developments would be built except by livestock operators where needed for the orderly use of the rangeland. BLM would periodically inspect allotments and monitor for trespass and would apply standard operating procedures for its rangeland management program. These procedures would protect cultural resources, protected and sensitive plants and animals, visual resources, wilderness values, big game, and other wildlife.

Consequences

As under the *Proposed Action, No Action* would mainly affect vegetation, livestock grazing, wildlife, and wild burros. Other resources and economic and social conditions would be only slightly impacted at most.

Vegetation

Continuation of present grazing would not benefit vegetation. Key forage would be overutilized in many areas year after year, rangeland in unsatisfactory condition would not improve, and some areas would continue to deteriorate slowly. Desirable perennial plants and cover would decline, although cover would only slowly change. Overall rangeland condition of public lands would slightly decline, but existing trends would continue: 21 allotments improving, 47 remaining static, and 10 declining. Percent key species composition would decline in areas deteriorating to a lower rangeland condition class. The condition of riparian vegetation would slightly decline in broadleaf riparian areas but not change in mesquite-tamarisk areas. Grazing

animals would continue to graze and trample protected plants.

Livestock Grazing

Livestock grazing would continue as at present. Livestock forage would decline on overstocked allotments, and grazing animals would continue to rely on ephemeral forage. The long-term value of rangeland for livestock production would decline. In the short term, high stocking rates could maintain livestock production and ranch income, but, over time, heavy stocking rates would reduce the ability of the rangeland to produce forage to sustain present grazing levels. As palatable vegetation decreases, so would livestock performance.

Wildlife

No Action would cause deterioration in wildlife habitat and reduction of some populations. Although the overall production of mule deer habitat would not greatly change, decreased forage might slightly decrease deer numbers. Decreases in cover would decrease the quality of pronghorn habitat and continue the downward trend in bighorn habitat. Upland and small-game habitat and populations would decline or remain unchanged. Nongame habitat would not noticeably change, but protected and sensitive habitat would slightly degrade with declining food and cover. Broadleaf riparian habitat would decline so that in the long term only 640 acres would be in better than fair condition.

Wild Burros

EIS area wild burro numbers would be held at 610, with burros annually consuming 3,600 AUMs of forage and 3.36 acre-feet of water. Heavy burro use would continue to disturb areas around water, desert tortoise habitat, and protected plants. Conflicts would continue to occur in wildlife habitat and on nonfederal lands. If ranchers use full authorized grazing preference, unallocated burro and wildlife use could cause a decline in rangeland productivity and in the health of the remaining burros.

INTENSIVE GRAZING MANAGEMENT

Description

This alternative would implement intensive grazing management on 35 allotments not now managed under ephemeral or custodial grazing and continue intensive management on 1 allotment. Its purpose would be to generate greater and more rapid increases in forage production and improve rangeland condition throughout the EIS area. Grazing permittees would play a significant role in developing the grazing systems and would incur a greater share of the costs of building and maintaining rangeland developments. The remaining 43 allotments would be nonintensively managed as under the *Proposed Action* because they are either designated ephemeral or have small amounts of public land.

Initial livestock forage allocations would be based on average licensed use during the past 5 years, an average 16 percent reduction in authorized grazing preference. Ten spring developments, 38 wells, 21 reservoirs, 10 miles of pipeline, and 122 miles of fence would be needed to implement *Intensive Grazing* at a cost of $1,307,600. Seven allotment management plans (AMPs) would be written in each of 5 years. All measures for resource protection and enhancement that would be applied under the *Proposed Action* would be applied under *Intensive Grazing*. Other elements of the program, including grazing systems, big-game and wild burro forage allocations, and implementation schedules would be the same as those under the *Proposed Action*.

Consequences

Under *Intensive Grazing* only vegetation, livestock grazing, wildlife, wild burros, and economic conditions would be greatly impacted. The other resources at most would be only slightly impacted.

Vegetation

Intensive grazing management would significantly benefit vegetation on 36 allotments proposed for intensive management. The 43 nonintensively managed allotments, however, would undergo little change. Applying intensive grazing management to 1,095,300 acres would increase ground cover more than would the *Proposed Action*. A greater amount of rest would allow a larger percentage of the EIS area to improve more rapidly than under the *Proposed Action*. Cover in the chaparral vegetation type would increase the most — from 52 to 58 percent.

With rangeland developments, grazing systems, and forage allocations, rangeland condition would improve. Areas in excellent condition would increase by 123,000 acres, and areas in good condition would increase by 146,000 acres. Trend, as well, would improve on intensively managed allotments as key species vigor and reproduction improve. On nonintensively managed allotments, trend would not greatly change. Grazing treatments, lower utilization, and rest during critical growth periods would lead to improved condition in riparian areas. In addition, intensive grazing treatments and vegetation allocations would benefit protected plants sensitive to grazing.

Livestock Grazing

Intensive Grazing would initially reduce allowable livestock numbers on public land by an average of 16 percent from authorized grazing preference. Thirty-five allotments would shift from continuous or sporadic grazing to grazing systems with periodic rest and seasonal deferments. More labor would be needed on intensive allotments, and the required rangeland developments would increase labor and maintenance costs. On the other hand, key forage species production

would improve vigor and increase the quantity and improve the quality of livestock forage.

Livestock on intensively managed allotments would have to change their grazing habits, adapting to new terrain and water sources, increased concentrations, and more frequent handling and movement. Resulting short-term weight losses, however, would be replaced by long-term weight gains, increased calf crops, and lower death losses. Livestock performance would not measurably change on nonintensive allotments.

Wildlife

The *Intensive Grazing* alternative would benefit wildlife on the 36 allotments proposed for intensive management. Increased vegetation production would improve big-game, small-game, and upland game habitat and greatly increase big-game numbers. New waters would increase disturbed areas by 2,800 acres and increase competition for some species, but the additional water would benefit water-dependent species. The 122 miles of new fencing would little affect wildlife except for disrupting deer movement and causing entanglement. Improved ground cover would notably improve nongame habitat, mainly the lower vegetation layers needed for cover by many species.

Protected and sensitive wildlife habitat would continue to degrade for some species but in the long term improve for the following animals: bald eagle, desert tortoise, Gilbert's skink, Gila monster, and sharp-skinned and Cooper's hawk. In the short term, riparian habitat would continue to deteriorate along present trends, but in the long term broadleaf trees would reproduce and replace older decadent trees on 66 percent of their habitat.

Wild Burros

Overall, *Intensive Grazing* would have the same impacts on wild burros as would the *Proposed Action.* New fences needed to implement a grazing system on the Palmerita Ranch in the Alamo Herd Management Area, however, might inhibit burro movement.

Economic Conditions

Intensive Grazing would benefit EIS area ranches in the long term. Annual net revenue for typical small, medium-sized, and large ranches would increase more than under the *Proposed Action,* as would ranch values and total net revenues over a 20-year period. Although operating expenses and workyears of labor would increase, total gross receipts for affected EIS area ranches would increase by $452,000.

SEASONAL GRAZING MANAGEMENT

Description

The *Seasonal Grazing* alternative proposes to implement seasonal livestock grazing from October 15 to June 1 on 35 allotments not now managed under intensive, custodial, or ephemeral grazing. It is designed to rest key species every year, to increase forage production, and to improve rangeland condition. Existing rangeland developments would be maintained, and new developments would be authorized for better livestock distribution and sensitive resource protection. Costing $370,300, these developments would include 7 springs, 23 wells, and 7 miles of pipeline. Initial stocking rates, big game and wild burro forage allocations, and measures for resource protection and enhancement would be the same as under the *Proposed Action.* Forty-three allotments would be managed nonintensively as under the *Intensive Grazing* alternative.

As an option under this alternative, eight allotments with low potential for perennial forage production would be classified and managed for ephemeral livestock grazing. Authorized grazing preferences would be canceled on these allotments, and livestock grazing would be authorized only when ephemeral forage is abundant.

Consequences

Seasonal grazing would greatly impact only livestock grazing, wildlife, wild burros, and economic conditions. All other resources at most would only be slightly impacted.

Vegetation

Seasonal grazing management would benefit vegetation by allowing 4.5 months of annual rest (normally from June 1 to October 15) on 35 allotments. The rest would remove the burden of livestock grazing from perennial forage in the late spring and allow forage to recuperate from grazing and to improve in vigor and reproduction. New rangeland developments would improve the distribution of livestock and allow proper use on previously underused areas. In the long term, overall cover would slightly increase and rangeland condition would improve on allotments proposed for seasonal grazing. Areas in excellent rangeland condition would increase by 107,000 acres, and areas in good condition would increase by 75,600 acres. Nonintensively managed allotments would continue their current trends: 10 allotments would continue to improve in condition, 25 would remain stable, and 7 would continue to deteriorate. As rangeland condition improves, key species composition would increase.

Riparian vegetation would significantly improve. Herbaceous vegetation would improve most rapidly, and woody species would also improve after protective measures are applied. Riparian plant cover would increase from 52 to 55 percent.

Seasonal Grazing would benefit the three protected plant species that might be impacted by grazing animals. *Mamillaria viridiflora* in the Harquahala and Harcuvar Mountains would improve because the 4.5 months of rest would reduce trampling and improve perennial grasses on which it depends for moisture and production.

Juncus articulatus and *Thelypteris puberula* var. *sonorensis,* both riparian species, would improve with improved riparian vegetation.

Vegetation response under the ephemeral option would differ little from that under *Seasonal Grazing,* but perennial forage would be given complete rest on eight allotments. Rangeland condition on five allotments would not significantly improve because of low rainfall and low potential for perennial forage production. Declining or stable rangeland condition on the remaining three allotments would improve to an unknown extent because of higher rainfall and greater potential of the range sites. The ephemeral option would impact riparian vegetation and protected plants the same as would *Seasonal Grazing.*

Livestock Grazing

Under *Seasonal Grazing,* initial livestock stocking levels would be the same as under the *Proposed Action.* Livestock numbers would be reduced by an average of 16 percent from authorized grazing preference. On the 35 allotments proposed for seasonal grazing, ranchers would either have to switch from cow-calf to steer operations or graze their cattle on nonpublic lands while their allotments are being rested. Seven of the 35 allotments, however, are already steer operations. New waters would better distribute livestock, and better livestock distribution and rest during the critical period of forage growth would increase more desirable forage species, which over time would increase livestock weight gains and reduce death losses.

Under the ephemeral option, grazing preference would be canceled on eight allotments. In the long term, however, livestock would benefit from improved rangeland condition and from being on rangeland only when ephemeral forage is abundant. Increased weight gains and reduced death losses would result.

Wildlife

The 4.5 months of rest on seasonal allotments would temporarily increase forage and cover for wildlife and increase cover and production of warm-season grasses and forbs important to wildlife. On the 36 nonintensive allotments, wildlife habitat would continue to improve or decline along present trends.

Seasonal Grazing would generally benefit big game, small and upland game, and waterfowl and shorebirds. The vegetation productivity of mule deer habitat would increase, and nearly 260,000 acres of deer habitat would improve to good or excellent condition. New waters would expand the ability of deer to forage in new areas. Livestock-deer competition for browse and space, however, would seasonally increase, and cover would slightly decrease. Bighorn sheep would benefit from rested allotments, additional waters, and increased forage. In the long term, mule deer numbers on public lands would increase to 3,330, bighorn numbers to 180, and javelina numbers to 990. Although each new water would benefit waterfowl and shorebirds, livestock disturbance of riparian areas would cause a slight decline in shorebird habitat. The productivity of upland and small-game habitat would increase by 5 percent in the long term. Increased plant cover and decreased competition for forage would mainly benefit lower layers of vegetation needed for nongame cover. Habitat with improved overall ground cover would increase by 42 percent.

In the very long term (beyond 20 years), habitat would improve for the following protected and sensitive species: bald eagle, peregrine falcon, desert tortoise, black hawk, Gilbert's skink, Gila monster, and sharp-skinned and Cooper's hawk. In the long term broadleaf trees in riparian habitat would replace older decadent trees on 66 percent of broadleaf habitat. On the remaining 34 percent, habitat quality would decline without intensive management.

By allowing more immediate short-term improvement and faster long-term improvement than *Seasonal Grazing,* the ephemeral option would have greater wildlife benefits on eight allotments than would *Seasonal Grazing.* Riparian, bighorn sheep, and desert tortoise habitat on allotments proposed for ephemeral grazing would improve faster than under *Seasonal Grazing.* In addition, all perennial forage could be grazed by mule deer without livestock competition.

Wild Burros

Seasonal Grazing would have the same impacts on burros as would the *Proposed Action,* except that no intensive grazing system would be implemented on the Santa Maria allotment. Thus, new fences would not be built that might inhibit burro movement.

Economic Conditions

Although ranch values would somewhat decrease for all typical ranch sizes and operator costs would be the highest of all alternatives, net ranch revenues and 20-year net revenues for all ranch sizes would increase more than under any other alternative. In addition, seasonal grazing would require only 16 workyears of labor for the yearly operation of all ranches, 7 workyears less than are now needed.

For the eight affected allotments, the ephemeral option would replace a somewhat dependable income source with an undependable source. The value of ranches losing their preferences would greatly decline, making it more difficult for the ranches to borrow long-term and operating capital. Moreover, ephemeral operations involve more risk than do yearlong operations.

ELIMINATION OF LIVESTOCK GRAZING FROM PUBLIC LANDS

Description

The *No Livestock* alternative would end livestock grazing on public rangelands. It is addressed to show the

impacts of removing livestock from the public lands, to provide the BLM managers with a wider range of options to study, and to facilitate a meaningful comparison of alternatives. Under this alternative livestock grazing would be phased out over 5 years, but BLM would continue to monitor the rangeland for trespass and wildlife habitat conditions. BLM would allow 300 wild burros to inhabit the Alamo Herd Management Area but eliminate populations in the Big Horn, Granite Wash, Harquahala, and Little Harquahala Mountains. Rangeland developments would be built only to benefit wildlife, wild burros, watershed, and other resources. To keep livestock off public lands, 1,750 miles of fence, 150 cattleguards, and 115 gates could be needed at a cost of $7,651,500. Annual maintenance for these developments would cost $90,670. All measures for resource enhancement and protection that would be applied under the *Proposed Action* would be applied under this alternative except those that pertain specifically to livestock grazing.

Consequences

Eliminating livestock grazing on public lands would greatly affect vegetation, livestock grazing, wildlife, wild burros, and economic conditions. Other resources would at most be only slightly impacted.

Vegetation

No Livestock would significantly improve vegetation on many allotments. Most forage species grazed by livestock would be allowed to complete growth and reproduction. Utilization of key forage species would greatly decline, thereby improving vigor, reproduction, and seedling establishment. Total vegetation would increase by 7 percent, and cover would moderately increase. Rangeland condition on 70 allotments with apparent stable or upward trends would improve as a result of reduced grazing pressure on key forage species. Rangeland in excellent condition would increase from 26,400 to 150,400 acres, and rangeland in good condition would increase from 412,500 to 558,800 acres.

Riparian vegetation would rapidly improve but level off in the long term as areas stabilize. Vigorous growths of cottonwood, willow, mesquite, and saltcedar would be returned to most streambanks as well as an understory of grasses and forbs. Riparian plant cover would increase from 52 to 60 percent. The vigor and cover of the three protected species affected by grazing would improve.

Livestock Grazing

The end of livestock grazing on public lands would cause an annual loss to the livestock industry of 46,033 AUMs of forage and a livestock production loss of over 4,000 cattle.

Ranching would drastically change. Ranchers on the 35 nonintensive allotments with little public land would suffer low impacts, but the 43 allotments with higher percentages of public land would be forced to reduce herd sizes or seek other sources of forage, such as private or state lands. Ranchers continuing to operate would face management problems. A highly intermingled land ownership pattern would limit grazing management alternatives and require frequent movement of cattle. And ranchers would need to invest large amounts to develop waters on isolated tracts of private or state land to make them suitable for grazing.

Wildlife

No Livestock is the only alternative that would measurably improve habitat on 25 custodial allotments with a static or downward apparent trend. Habitat would improve more than it would under increased vegetation production alone, and improvement would occur in the short and long term. In the long term the forage productivity of mule deer habitat would increase by 7 percent and bighorn sheep habitat by 16 percent. Deer numbers on public lands would increase from 2,800 to 4,440, bighorn from 100 to 250, antelope from 0 to 5, and javelina from 560 to 1,040. Plant cover around waters and riparian areas would significantly increase, greatly benefiting waterfowl and shorebirds. Quail cover and forage would increase, and nongame habitat would significantly improve as a result of a 7 percent increase in forage, increased plant cover, and increased height and cover of unused grasses and forbs. Most protected and sensitive wildlife habitat would improve, and many protected and sensitive wildlife populations would increase.

In the long term, riparian habitat condition would improve by nearly 30 percent, and no broadleaf riparian habitat would remain in poor condition. Woody riparian plants would flourish, and the structural diversity of riparian vegetation would increase.

The frequency of wildfires would increase as fuel production increases by 15 percent. If allowed to burn significant acreages, wildfire in certain vegitation types could increase the production of forage and cover as well as speed up beneficial habitat changes.

Wild Burros

The *No Livestock* alternative would have beneficial and adverse impacts relating to wild burros. The removal of burros from certain mountain areas would reduce burro-bighorn competition and the trampling of desert tortoise critical areas and provide relief to protected plants. In addition, removing allotment boundary fences could allow greater mixing of burros for genetic survival. New fencing separating public from nonpublic lands, however, could interfere with burro movement. Other adverse impacts include the removal of a genepool of red burros and white burros in the Harquahala-Big Horn Mountains; conflicts in the Alamo Herd Management Area with raptors, protected plants, and bighorn sheep reintroductions; and the conflict between burro grazing around Alamo Lake and plans to establish

waterfowl habitat.

Economic conditions

Eliminating livestock grazing on public lands would severely impact EIS area ranches. Herd sizes would have to be reduced an average of 73 to 85 percent depending on ranch size, and net income would decline by as much as 90 percent. The 20-year net revenue value of all size ranches would greatly decline, as would ranch values. Ranchers would have difficulty borrowing capital or repaying existing loans, and operators of most medium-size and large ranches would probably have to seek outside income. Ranches put up for sale might be combined to form an economic unit, but tracts with large amounts of public land would be difficult to run as integral ranches due to distances between state and private holdings. Total ranch operating expenses would decline from $497,000 to $128,000; total gross receipts would decline from $996,000 to $191,000; and the amount of labor needed to operate ranches would decline from 23 to 3 workyears

Installing fences, cattleguards, and gates would add $765,000 per year in earnings to the regional economy, but this amount would be less than 1 percent of the economic study area's yearly construction earnings.

COMMENTS AND RESPONSES

JUNIPER TREE

COMMENTS AND RESPONSES

Review Process

The draft EIS was filed with the Environmental Protection Agency on March 19, 1982. The 60-day comment period ended May 21, 1982. A notice of availability of the draft EIS, including the announcement of the public hearings, was published in the *Federal Register* on March 24, 1982.

Over 300 copies of the draft EIS were mailed to federal, state, and local government agencies, organizations, and individuals for review and comment. News releases from Washington and Phoenix provided information on how to obtain copies of the draft EIS.

BLM conducted public hearings in Wickenburg and Phoenix, Arizona on May 4 and 5, 1982, respectively, to receive oral testimony on the draft statement. Six individuals spoke in Wickenburg and two spoke in Phoenix. In addition, 18 letters of comment were received from various agencies, organizations, and individuals.

The EIS team reviewed all comments and responded to those presenting new data. questioning the draft analysis, or raising issues relating to the environmental impacts of the *Proposed Action* and alternatives. All comments pertaining to the *Proposed Action* or alternatives will be considered by BLM managers in making grazing management decisions for the Lower Gila North Planning Area.

The final EIS, which includes the written comments and hearing transcripts, will be sent to the Secretary of the Interior, the Environmental Protection Agency, and those agencies, organizations, and individuals who received the draft EIS. Copies may be inspected at the following BLM offices: the State Office, Phoenix, Arizona; the Office of Public Affairs, Washington, D.C.; and the Phoenix District Office, Phoenix, Arizona.

Public Hearings

Following are the complete transcripts of the public hearings held in Wickenburg and Phoenix. Specific comments on the draft EIS are identified by number. BLM's responses to these comments follow the transcripts and are identified by the corresponding number.

All testimony presented at the hearings has been reviewed and will receive full consideration as decisions are made pertaining to the grazing management program. BLM appreciates the time given by individuals who spoke at the hearings and their genuine concern for good rangeland management on public lands in the Lower Gila North Planning Area.

U. S. DEPARTMENT OF THE INTERIOR

BUREAU OF LAND MANAGEMENT

In the Matter of)
)
LOWER GILA NORTH) A PUBLIC HEARING
)
Draft Grazing Environmental)
Impact Statement)

Conference Room
Community Center
160 North Valentine
Wickenburg, Arizona

Tuesday, May 4, 1982

Pursuant to Notice and Publication, the above-entitled matter came on for hearing at 7:30 p.m.

BEFORE: ROBERT MOELLER, Esq.
Attorney-Advisor
Office of the Solicitor, DOI
Phoenix, Arizona

PANELISTS: BILL CARTER, Team Leader
BLM District Office
Phoenix, Arizona

BILL BARKER, Phoenix Dist. Mgr.
BLM District Office
Phoenix, Arizona

DEAN DURFEE, Lower Gila Area Mgr.
BLM District Office
Phoenix, Arizona

HEARING ASSISTANTS: KAREN DANIELS and HECTOR ABREGO
BLM District Office
Phoenix, Arizona

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P R O C E E D I N G S

PRESIDING OFFICIAL: I'd like to call the hearing to order. Let the record show that the hearing was convened at 7:35 on May 4, 1982 at the Community Center, Wickenburg, Arizona.

I'd like to welcome you this evening to the environmental hearings on the Draft Grazing Environmental Impact Statement, Lower Gila North, prepared by the Bureau of Land Management, U. S. Department of the Interior.

My name is Bob Moeller and I'm an attorney in the Field Solicitor's Office, for the U. S. Department of the Interior and I'll be conducting the hearing this evening.

I'd like to introduce to you Bill Barker, the Phoenix District Manager, and Bill will introduce the rest of the members of the Panel here.

MR. BARKER: Thanks, Bob. Yes, I'll introduce the rest of our "partners in crime" here. I think most of you know Dean Durfee. the Area Manager for the Lower Gila Resource Area.

The fellow on the end is Bill Carter, who is the Environmental Impact Statement Team Leader for the District right now.

Just a few comments on the background of what we're doing here:

First of all, I might say that this will consist initially of a formal hearing, which will be conducted by Bob, as he indicated, at which time, we'll hear whatever comments you might have.

Then once we close the hearing record, we'll have a question and answer session, as long as you folks have any questions you might ask, or just as long as we're here.

The Environmental Impact Statement is required by the National Environmental Policy Act of 1969, and also responds to the 1974 settlement of a lawsuit that was initiated by the Natural Resources Defense Council.

The Lower Gila North EIS is the third such statement to be completed in the Phoenix District. The other two were both in the Kingman Resource Area in Mojave and Yavapai.

A draft land-use plan, or management framework plan which includes the proposed Rangeland Management Program analyzed the Draft EIS was completed in 1981. Final decisions on all the recommendations in that plan will be made no sooner than thirty days after the filing of the Final Environmental Impact Statement with the Environmental Protection Agency.

The proposed action and four alternatives are described and analyzed in detail in the EIS. The final

decision may result in acceptance of the proposed action, or some combination of the propoaed action and various alternatives.

This decision will be announced as part of a Rangeland Program Summary, which will be published within five months of the filing of the Final Impact Statement.

To meet the cort-ordered schedule, the Final IMpact Statement must be filed with EPA by September 30, 1982.

Comments on the Draft EIS are requested for a period of sixty days from the date of publication, or until May 21, 1982. Comments received after that date will be considered in the decision process, even though they may be received too late for inclusion in the Final Impact Statement.

Any written comments should be sent to the District Manager, Bureau of Land Management, 2929 West Clarendon Avenue, Phoenix, Arizona, 85017. And all written and oral comments will receive equal consideration and will be addressed in the Final Environmental Impact Statement.

So Bob, if you want to go ahead and conduct the hearing?

PRESIDING OFFICIAL: Thanks, Bill. I think what I would like to do this evening is probably put a ten-minute

time limit on your teatimony. I'm not going to hold to that very severely at all, becauae we don't have that many people who have indicated that they want to testify.

For those of you who have not listed yourselves as wanting to give testimony thia evening, if anybody changes their mind and wants to give testimony after the few people who have indicated that they want to teatify have done so, just raise your hand.

As I call your name, I'd like you to come on up to the microphone, because the Court Reporter can hear you better, I think. Give your name and whether or not you're representing a group, and if you are, what group or entity that you're representing, or whether you're just represe-senting yourself, and we'll be happy to receive your comments. As I say, the purpose of these hearings is for our benefit, as well as your benefit, and to -- we need your comments and we welcome your comments, whether they be in support of the Statement of critical of the Statement in any way.

As Bill mentioned, the record this evening will be open until May 21, 1982, so those of you who might be a little reluctant to give oral testimony, if you want to submit your comments in writing, we'll be happy to receive those comments. They are given equal weight, in terms of whether they are written or oral. That doesn't make any

difference at all. It just depends on what you feel most comfortable with. And they can be sent to the Phoenix District Office, Bureau of Land Management, at 2929 West Clarendon Avenue, Phoenix, Arizona, 85017.

As Bill also mentioned, the purpose of the Panel being here thia evening are to personally hear your comments and also to provide information, to answer your questions. However, I'd like to conduct the formal part of the hearing on the baais of hearing your comments, and then after the hearing is over, they'll be free to answer any questions that you have.

I'd like you keep in mind that this isn't really an adversarial proceeding at all. It's a proceeding to offer you a forum for your teatimony.

The firat person that's indicated a wiah to testify tonight is Irene E. Aja. Is that correct, Irene?

MRS. IRENE E. AJA: My name ia Irene Aja and I represent the Ohaco Sheep Company. Good evening, members of the Panel and ladies and gentlemen in the audience.

I appear before representatives of BLM in objection to the EIS, Lower Gila North. I, in almost sur-rendering fatigue, reflected back twelve years or so at so many of the men who have trooped in and out of our grazing lives. The social effectiveness of too many rate on a par

with the abilities of our most highly heralded economists who have guided our nation to what many accept as the eve of national disaster.

I sat on my mother's lap while my father, older brothers and relatives were prodded by the Taylor Grazing Act to create enclosures of integrity and long-term effect-iveness. They worked on fences, wells, windmills, stockponds and they sweated and prospered, and so did the nation. Cholesterol became of great concern for the human body, but the fat growing in our nation's governmental bloodstream haa been ignored. We know some of the causes and can relieve them, but we keep choking the goose with federal largesse of programs and restrictions.

The EIS, the EPA, the AMP's, the MFP's -- they are the strangulation holds of the past, where, when many in government positions told us of three-day work weeks, unlimited energy, retirement at fifty and a remaining life of boredom unless we locked up all of our lands so that people could play on them. They are good soldiers and they are obeying orders, the orders of past Administrations, influenced by special interest groups, many of whom were either so wealthy, or so irresponsible, that they fought to make enclaves of one third of our nation's land. Although they represent less than one percent of the people who could

enjoy such luxury, their voices were loud, as only the indolent can afford. Too many weak officials glued by fear to their political seats were eaaily prompted to ponder their cause for power and security -- whatever the latter means.

Today, we have no security. We have people who will go back to six or seven-day work weeks to avoid starvation, and the retirement too many are receiving is tragic bankruptcy. These people make up most of the nation and likely now include many of the idealists whose ignorance has been cured the hardest and most cruel of ways -- economic malnutrition.

Our ranch, a family-owned business now nearing its sixtieth year has been ao poorly managed, say the recommendations, that thirty percent of it qualifies for pristine wilderness and our reward is to be a sixteen percent reduction. The sixteen percent mathematical certainty alone, leaves anyone familiar with just weather, with the aame respect for the "scientific bases" as has Mr. Stockman with his "on-and-off-the=record" proclamations of the supply side economic panacea.

W-1

We object to the entire management approach by BLM for our ranch and for our public lands. Our hurt isn't too much viewed in the national interest, but the combined

injury to our nation that is part of the opiate fed Uncle Sam that there is a better way than work and resource utilization. The holistic approach to protecting Jack and Jenny Asses at the expense of red meat for people puts the whole program in today's ludicrous and mournful context. Anyone old enough to have lived the fears, triumphs and expectation from World War II through Viet Nam just simply has to fall in tears in fear of what liea ahead for us if someone, somewhere -- and now -- doesn't rise on the scene and say, "Enough. Enough. Get the blank out of the working man's way and let him help us all."

Where species, other than those produced for human consumption, are truly endangered, let them -- no, cauae them to be protected. But where the "protection" is to increase their numbers for recreational slaughter, let's awaken to our plight.

I speak with the same objectivity or prejudice as does a professional wildlife game specialist on your staff whose check and future comea from hia support groups. But selfish as we both may be, my work, the resource user's work, is the work which makes his pay and his play posaible.

All I, my husband, my children, my parents now in peace have known is work. Six a.m. is late rising and nine p.m. is too late to watch the Super Bowl. We'd love

the three-day week, the endless and unlimited energy, and we'd love to play the reat of our lives. Make that poasible and we'll make a donation of our ranch. Until then, put these propertiea back in the hands of those who have known them, who have to treat them well, so aa to be served next year -- on and on.

The most vicious untruth lies in the charge of overgrazing by any knowledgeable rancher, except by some, justifiably motivated to lose all interest becauae someone who has never picked up the carcasses of fifty or a hundred of his sheep, dealt the fatal blow by a playful lion, decides when to graze or not. That alone has caused the under-utilization which now becomes the sixteen percent reduction factor. They don't know that you don't go to some super-market and buy five hundred head of yearlings today to put on tomorrow, if BLM decidea the grass will make.

How do you meet someone halfway? I auggest a moratorium on all management plans on all EPA processea, with a "re-look" commission, and let's have them go over the madnesa of the past twelve years and see what the eating public wants. I know there were workshops composed of ranchers, one of them my husband, miners, environmentalists, wildlifers and et cetera. I personally feel that almost all of what came out of those meetings was conveniently

overlooked in the final draft.

Addressing our ranch units 3060 and 3029, I simply say the Draft EIS is challengable, on part, in every single one of it's points as it relates to livestock, and is wrong, prejudiced, or maliciously favorable for all other "values".

Our lower use for the past five years reflects good rancher practices, which will continue, but the sixteen percent figure hamstrings all poasibility for use when there are feed bonanzas. The sixteen percent seems as a diabolical defenae presented in anticipation of the complaint -- a sort of "We aren't hurting them. Look. That's all they used in the past five years." That kind of approach to land management is for novels and political demagoguery. It is indefenseable in the real world.

It is very interesting to note that the preparers of this EIS have a hundred and fourteen and a half years experience in the BLM, three and a half years experience in U. S. Geological Survey, fourteen and a half years experience in SCS, two years experience in private consulting, two years experience in Arizona State Parks, one year experience in the Forest Service and thirteen years experience in private ranching. If this ranching experience was in another state, how qualified can it be for the lands and ranches in Arizona?

Just as farming practices completely differ in the Midwest from those in Arizona, so do ranching practices differ in Arizona from those in any other part of the country.

Domestic sheep have been blamed for the decrease in big horn sheep in the area of the EIS. I suggest that a closer look at the lions in the area may result in the findings that they have contributed much more to the decrease in big horn sheep than the domestic sheep have. Also, a look at the insect predators, such as aphids, have done more to damage the area than livestock, for this year they ate more of the forage than the livestock did.

My laat remark will be that although livestock play a large part in this EIS, no photo was included, although grasses and rangeland improvements and many species of wildlife were well represented in the photography of the EIS. That just might be a subtle way of telling we ranchers of the unimportance of our contribution to the economy of this country.

Thank you very much, Gentlemen.

(A document from which the above statement was read was presented to the Preaiding Official, marked for identificaiton as Hearing Exhibit 1 and attached hereto.)

PRESIDING OFFICIAL: Thank you, Mrs. Aja. The next speaker is John W. Simpaon. Mr. Simpson?

JOHN W. SIMPSON: Gentlemen and audience, I have written in my comments already and I feel that the words expressed by Mrs. Aja, I think -- I don't think I can add anything to it. I think she's covered just about everything that I could say.

And I would like to say that I hope that everyone concerned will, at least, regard the people that are in the ranching business, that we hava been hare a long time and we would like to stay. Thank you.

PRESIDING OFFICIAL: Thank you, Mr. Simpson. Does anyone else wish to offer any testimony this evening, at all? Just come on up and give your name and who you represent, if anybody.

WOODY GRANTHAM: My name is Woody Grantham. I mainly represent the Coughlin "A" and "B" Allotments on the BLM. I would like to say that I don't agree with the EIS report.

For one thing, the Coughlin "A" Allotment hasn't been run at capacity for the last thirty-eight years -- probably, at about fifty percent capacity. Now, in their proposal, they are trying to cut it by fifty percent. So I would like to just make it a part of the record that I am

disturbed and concerned about the fact of how they can juatifiably come up with these figures.

I'd also like to add my support to Mrs. Aja's statements that she made earlier. I think we all agree with those. Thank you.

PRESIDING OFFICIAL: Thank you. Anyone else?

CARL MILLER: I'm Carl Miller, and representing the Grapevine Ranch, which is partly in Mojave County, Yuma County and Yavapai.

W-2

On the Santa Maria River, they also want to cut us back. We have had no cattle on our allotment for four years, leaving it come back, due to money, partially. Also, we would like to see it come back. It has been grazed.

I have been -- lived there since I was four years old, and in and out of there. I haven't seen much change. On good years, we have good feed and in bad years, we don't have any, just like all the rest of the people.

They're taking a lot of stock in the burros. We have, in the past, taken care of the burro situation. Of course, I know that's partially out of, probably, BLM's hands -- people wanting to protect them. But they are taking more stock in the burros than they are the rancher.

In the Alamo Lake area, on the west side, which is Gabe Madril's -- he's my uncle -- he's part of the corporation.

They want to delete that grazing within three to five years. I'm on page 31. They want to leave it to the burros -- run two hundred head of burros over there. They're not looking out for the rancher a bit.

W-3

Same way on the Grapevine Springs. They want to -- apparently, they think more of the burros. On page 53, they talk about the Javelina. Javelinas compete less with burros and livestock than do other big game because Javelinas eat different forage. Javelinas have been known to eat prickly pear, cactus, acorns, berrys, mesquite beans, succulences. I agree, yeah, that they do that, but cattle eat mesquite beans, too. In fact, it's one of the best feeds that we have in dry years.

I would like to see them leave it in -- let's see -- on page -- they state in one place here where they would like to have cattle on the range certain times and then pull them off. Cattle always go where the feed is. If there's no feed, why, naturally, they won't go. And I don't believe they've hurt it any. As I say, I've been out there forty-eight years of my life and I can't see too much that they have damaged, even with the erosion.

The one picture they had here of a hill eroding. I can show you a lot of those around the country, but I don't believe it was due to the stock, wildlife or the stock

as on page 122. I can show you stuff just like that on Date Creek, as you go across what used to belong to Chet Fuller. The picture looks like it was taken over there, in fact. And it's hilly. There's no way of controlling it. It's soft dirt.

You know, you can put on paper what you want, but you go out there and look and some of these things -- it's all fine and well; I know they're trying to do right, but I think if they'd let the ranchers protect their own ground -- no one wants to feed cattle the year 'round, that's for sure. Thank you, Gentlemen.

PRESIDING OFFICIAL: Thank you. Anyone else? Anyone else to testify? Give your name, please.

TOM BONER: Mr. Chairman, I'm Tom Boner. My wife and daughter-in-law and I operate the Boner Ranch. It's the Aguila Allotment. And I see in this Draft of the EIS that the Aguila is listed as the largest allotment in this area and I hope that just because it has a lot of acres isn't the reason why so many of them are in jeopardy. I see that there is something like seventy-five thousand acres that are being taken away for wild sheep and thirty-some thousand acres that are being taken away for the tortoises and the big horns, and part of the Harquahalas are also in jeopardy from the wilderness people.

It may be that we the people here tonight who look at these records and see that the Aguila Allotment covers a lot of acres, by the time the BLM gets through with it, it may be one of the smallest ones in the outfit.

I don't have any written testimony to turn in tonight, but I do have a few comments to make.

One, on vegetation, it is proposed in the proposed action. And I have no comments to make on any of the alternatives because I don't believe that even if we have to have some kind of a management plan -- and I don't object to a management plan, if it's worked out so that it's equal for everyone -- then I think that the proposed action is probably the ona that could have some support.

But how do you propose to increase the vegetation? Will there be some seeding? And will it be permanent-type grass types that will be put in, and how do you intend to do that?

And then, as far as the wild burros are concerned, burros are not wild. They never have been wild. And as far as I'm concerned, there is no reason why there should be a burro on any of this federal land, unless it would be in somebody's park, or in a corral. People can own them and do what they want to with them, just as they can any other domestic animal. And they're not extinct; they're not

endangered at all, and there's no reason for them to be here and to have livestock have to compete with them, or wildlife, either.

I also see that the proposed action plan provides that there will be no more burros on the Aguila Allotment and I say, hallelujah and amen, I sure appreciate that.

And I think the Final Draft should provide for some flexibility in the areas such as the utilization of feed, which is as proposed in here, would be fifty percent left. Now, if that's annual feeds, it's a total waste, because a hard rain will beat that down and wash it away. If it's perennial grass, then I think that something up to fifty percent might be allowed, or at least some utilization to leave some on the ground. But I can't see any sense in leaving annual feed that the wind and the rein will wash away. If livestock can graze it when it's dry and it's seeded out, then a lot of that seed is trapped into the ground before the rain has a chance to wash it away.

And I'm not sure that I understand too much what's meant by "sensitive plants", because there are plants being found on the Aguila Allotment that haven't been seen for -- well, at least none of the BLM people have seen them before, but they're finding them now. And when we came down here -- and I've been a rancher all my life and protecting

the ground and protecting the vegetation, and it's been part of my life. And I have been trying to do something about bringing back part of this ranch that we're on now. And by not grazing as heavily as the former owners have. And I think it's showing up. There are plants coming back out there and there is better grazing, and I see no reason for any management plan that calls for a cut in the livestock numbers that we're running now. I think there's some better practices of range management, and there's some reseeding, probably some rotation that we will increase the forage and there'll be no need to eliminate part of our livestock.

In the area of roads and maintenance of roads, it wouldn't be possible on the Aguila Allotment to achieve any kind of success, if we have to build fences by packing everything out there, or if we have to take care of our wells by packing everything out by horseback. You can't do it. Probably, on some smaller allotments, you can get by with that, but we can't just because there's no way to get around. You can't get over the washes, you can't get anywhere without some good graded roads. And I hope that when this Final Draft is prepared that there will be some allowance in there that will let a man do the things that are necessary in order to achieve the goals that are set by the Proposed Action Plan.

W-4

And then also, I see no reason for the north slopes of the Harquahala Mountains being taken out of production because someone was up there at the right time in the spring and saw an area that they classed as pristine area I can show you pristine areas anywhere on the Aguila Allotment, if you're there at the right time of the year. It takes moisture at the right time. And it takes a combination of plants that come up and they're not disturbed, and anyplace on the Aguila Allotment could be classified as pristine, if you're there at the right time, but a pristine area that might be classed that way this year certainly might not be next year, because if the moisture doesn't come at the right time, and that certain combination of plants don't come at the right time, then the total area may not be anything that anybody would want to look at.

So I think that restricting grazing on any area in this desert, because someone says it's a pristine area, is just not valid at all. And I do agree with Mrs. Aja that regulations and restrictions have been part of our problem for a long time and I certainly hope that this Final Draft can be put together with a lot less and with a lot more emphasis on livestock, which is the only moneymaking thing that's on the BLM grounds today.

Wildlife and the tortoises and the big horn sheep

and pristine areas and sensitive plants don't bring any money to anybody. But I think that something has to be done and I'm sure that because of the laws that have been written, something will be done, but I just hope that it will come out more equal for the livestock people. Thank you.

PRESIDING OFFICIAL: Thank you. Anybody else?

JIM NELSON: I'm Jim Nelson, with the Santa Maria Community Allotment. And the comment that I'd like to make is that we have ninety-seven and a half sections of land that's BLM state lease land. We have a sixty-six head permit. BLM wants to cut our permit back.

W-5

Okay, sixty-six head over a ninety-seven and a half sections isn't very many cattle. Now, it seemed to be that it was fine when eleven oil companies were out there on the same allotment, blading roads in there every quarter of a mile, it didn't seem to be bothering the land any. But apparently, the hooves of sixty-six cattle destroy the ground and the range.

These miners have gone in there. They've destroyed springs and water so the wildlife and cattle can't use them, and that seems to be all right. I think that if there's going to be anything done, it should be done to curb the mining operations that are destroying the land -- permanently destroying the land. That's my comments.

PRESIDING OFFICIAL: Thank you, Mr. Nelson. Anyone else wish to testify this evening?

CARL MILLER: I'd like to make one other comment.

PRESIDING OFFICIAL: Go ahead.

CARL MILLER: I was stammering here and I was trying to give you a page number 32. They put in paragraph 20 here, "BLM will designate as areas of critical environmental concern (ACECs) 9,500 acres of public land along the Bill Williams and Santa Maria Rivers, Arrastre and Antelope creeks, Peoples Canyon, and Grapevine Springs. The designations will be used to focus management concern on significant riparian habitats in unsatisfactory condition or vulnerable to rapid deterioration."

That's the same thing that my cousin is talking about -- about bulldozing roads every quarter of a mile. I still can't see why -- and it's very distasteful to me to see them consider that as a critical environmental area. I don't know why -- and I can't feature why. There's eight springs within three miles and access to all but one of them is through private property, Big Cliff. The only way they can come in is down through Palmarita Ranch and right through us. And it's all private land. Everything that I have ever read about the Grapevine Springs Ranch, it sounds like someone else owns it, that we don't have anything to

do with it. My grandad got the rights on eight springs in 1915. He filed on them in 1914 and got the rights on them in 1915. They were certified in 1927 with the state. We have updated them; we have used them ever since.

I wouldn't like to see them make that a critical area and that's for sure. I can't see where it's any worse than anywhere else -- Pipeline Ranch, or whatever, not knocking Pipeline Ranch. But it isn't. I don't think it's -- I think it's a little bit better.

PRESIDING OFFICIAL: Thank you. Does anybody else wish to testify this evening?

(No response)

PRESIDING OFFICIAL: If not, I would also like to announce that there will be another hearing tomorrow evening, May 5th, at the Rodeway Inn, Metro Center, 10402 North Black Canyon Highway, at the Orchard Room No. III meeting room, at 7:30.

So if there aren't any other folks who want to testify this evening, I'm going to go ahead and close the hearing. And as I say, if anybody wants to question our experts here, go ahead.

(Whereupon, the hearing was closed.)

CERTIFICATE

THIS IS TO CERTIFY THAT the foregoing proceedings in the matter of the Lower Gila North Draft Grazing Environmental Impact Statement were had as herein appears, and;

THAT the foregoing pages 1 through 24 are a true and correct transcript of my stenographic materials taken at the time and place hereinbefore written.

Charles Emmons
CHARLES EMMONS & ASSOCIATES
GSA Contract Reporters

RESPONSE - WICKENBURG HEARING

W-1 The Ohaco and Echeverria allotments are not scheduled for any reductions in grazing use. In cooperation with the livestock owner, BLM will gather data over a 5-year period and adjust stocking rates accordingly (see page 138, draft EIS).

W-2 The Santa Maria allotment is not scheduled for any reductions in grazing use. Monitoring data will be used to make any needed adjustments in grazing use (see page 139, draft EIS).

W-3 BLM proposes to reduce the burro herd population grazing an area of 300,000 acres from approximately 300 to 200 burros. Burros inhabited and used this area when the Wild Horse and Burro Act was passed in 1971. BLM is allocating 180 AUMs, enough forage to sustain 30 burros on the Santa Maria allotment.

W-4 As discussed on page 30 (last paragraph) of the draft EIS, BLM with your cooperation and input would develop a grazing system that would maintain or improve the condition of the north slopes of the Harquahalas.

W-5 See Response W-2.

BLM PUBLIC HEARINGS PRESENTATION
May 4, 1982 Wickenburg
Presented by Irene E. Aja

I APPEAR BEFORE REPRESENTATIVES OF BLM IN OBJECTION TO THAT E.I.S. (LOWER GILA NORTH). I IN ALMOST SURRENDING PATIGUE REFLECTED BACK TWELVE YEARS OR SO AT SO MANY OF THE MEN WHO HAVE TROOPED IN AND OUT OF OUR GRAZING LIVES. THE SOCIAL EFFECTIVINESS OF TOO MANY RATE ON A PAR WITH THE ABILITIES OF OUR MOST HIGHLY HERALDED ECONOMISTS WHO HAVE GUIDED OUR NATION TO WHAT MANY ACCEPT AS THE EVE OF NATIONAL DISASTER.

I SAT ON MY MOTHERS LAP WHILE MY FATHER, OLDER BROTHERS AND RELATIVES WERE PROOOED BY THE TAYLOR GRAZING ACT TO CREATE ENCLOSURES OF INTEGRITY AND LONG TERM PRODUCTIVINESS. THEY WORKED ON FENCES, WELLS, WIND MILLS, STOCKPONDS AND THEY SWEATED AND PROSPERED, AND SO DID THE NATION. CHOLESTEROL BECAME OF GREAT CONCERN FOR THE HUMAN BODY BUT THE FAT CHOWING IN OUR NATIONS GOVERNMENTAL BLOOD STREAM HAS BEEN IGNORED. WE KNOW SOME OF THE CAUSES AND CAN RELIEVE THEM BUT WE KEEP CHOKING THE GOOSE WITH FEDERAL LARGESSE OF PROGRAMS AND RESTRICTIONS.

THE E.I.S., THE E.P.A., THE A.M.P'S, THE M.P.P"S-----THEY ARE THE STRANGULATION HOLDS OF THE PAST WHERE WHEN MANY IN GOVERNMENT POSITIONS TOLD US OF THREE DAY WORK WEEKS, UNLIMITED ENERGY, RETIREMENT AT FIFTY AND A REMAINING LIFE OF BOREDOM UNLESS WE LOCKED UP ALL OF OUR LANDS SO THAT PEOPLE COULD PLAY ON THEM. THEY ARE GOOD SOLDIERS AND THEY ARE OBEYING ORDERS, THE ORDERS OF THE PAST ADMINISTRATION, INFLUENCED BY SPECIAL INTEREST GROUPS, MANY OF WHOM WERE EITHER SO WEALTHY OR SO IRRESPONSIBLE THAT THEY FOUGHT TO MAKE ENCLAVES OF ONE-THIRD OF OUR NATIONS LAND. ALTHOUGH THEY REPRESENT LESS THAN ONE PERCENT OF THE PEOPLE WHO COULD ENJOY SUCH LUXURY, THEIR VOICES WERE LOUD AS ONLY THE INDOLENT CAN AFFORD. TOO MANY WEAK OFFICIALS GLUED BY FEAR TO THEIR POLITICAL SEATS WERE EASILY PROMPTED TO PONDER THEIR CAUSE FOR POWER OR SECURITY, WHATEVER THE LATTER MEANS.

Hearing Exhibit # 1

WILDLIFE GAME SPECIALIST ON YOUR STAFF WHOSE CHECK AND FUTURE COMES FROM HIS SUPPORT GROUPS. BUT SELFISH AS WE BOTH MAY BE, MY WORK, THE RESOURCE USERS WORK, IS THE WORK WHICH MAKES HIS PAY AND HIS PLAY POSSIBLE.

ALL I, MY HUSBAND, MY CHILDREN, MY PARENTS NOW IN PEACE HAVE KNOWN IS WORK. SIX A.M. IS LATE RISING AND NINE P.M. IS TOO LATE TO WATCH THE SUPER-BOWL. WE'D LOVE THE THREE DAY WEEK, THE ENDLESS AND UNLIMITED ENERGY AND WE'D LOVE TO PLAY THE REST OF OUR LIVES. MAKE THAT POSSIBLE AND WE'LL MAKE A DONATION OF OUR RANCH. UNTIL THEN, PUT THESE PROPERTIES BACK IN THE HANDS OF THOSE WHO HAVE KNOWN THEM, WHO HAVE TO TREAT THEM WELL SO AS TO BE SERVED NEXT YEAR, ON AND ON, THE MOST VICIOUS UNTRUTH LIES IN THE CHARGE OF OVER-GRAZING BY ANY KNOWLEDGEABLE RANCHER, EXCEPT BY SOME JUSTIFIABLY MOTIVATED TO LOSE ALL INTEREST BECAUSE SOMEONE WHO HAS NEVER PICKED UP THE CARCASSES OF FIFTY OR A HUNDRED OF HIS SHEEP DEALT THE FATAL BLOW BY A PLAYFUL LION, DECIDES WHEN TO GRAZE OR NOT. THAT ALONE HAS CAUSED THE UNDER UTILIZATION WHICH NOW BECOMES THE SIXTEEN PERCENT REDUCTION FACTOR. THEY DON'T KNOW THAT YOU DON'T GO TO SOME SUPERMARKET AND BUY FIVE-HUNDRED HEAD OF YEARLINGS TODAY TO PUT ON TOMORROW IF BLM DECIDES THE GRASS WILL MAKE. HOW DO YOU MEET SOMEONE HALFWAY? I SUGGEST A MORATORIUM ON ALL MANAGEMENT PLANS ON ALL E.P.A. PROCESSES WITH A "RE-LOOK" COMMISSION AND LETS HAVE THEM GO OVER THE MADNESS OF THE PAST TWELVE YEARS AND SEE WHAT THE EATING PUBLIC WANTS. I KNOW THERE WERE WORKSHOPS COMPOSED OF RANCHERS, (ONE OF THEM MY HUSBAND) MINERS, ENVIORNMENTALISTS, WILDLIPERS AND ETC.. I PERSONALLY FEEL THAT ALMOST ALL OF WHAT CAME OUT OF THOSE MEETINGS WAS CONVENIENTLY OVERLOOKED IN THE FINAL DRAFT.

ADDRESSING OUR RANCH UNITS 3060 AND 3029, I SIMPLY SAY THE DRAFT E.I.S. IS CHALLENGABLE, ON PART, IN EVERY SINGLE ONE OF IT'S POINTS AS IT RELATES TO LIVESTOCK, AND IS WRONG, PREJUDICED OR MALICIOUSLY FAVORABLE FOR ALL OTHER "VALUES".

TODAY WE HAVE NO SECURITY, WE HAVE PEOPLE WHO WILL GO BACK TO SIX OR SEVEN DAY WORK WEEKS TO AVOID STARVATION AND THE RETIREMENT TOO MANY ARE RECEIVING IS THAGIC BANKRUPTCY. THESE PEOPLE MAKE UP MOST OF THE NATION AND LIKELY NOW INCLUDE MANY OF THE IDEALISTS WHOSE IGNORANCE HAS BEEN CURED THE HARDEST AND MOST CRUEL OF WAYS--ECONOMIC MALNUTRITION.

OUR RANCH, A FAMILY OWNED BUSINESS NOW NEARING ITS SIXTIETH YEAR HAS BEEN SO POORLY MANAGED, SAY THE RECOMMENDATIONS, THAT THIRTY PERCENT OF IT QUALIFIES FOR PRISTINE WILDERNESS AND OUR REWARD IS TO BE A SIXTEEN PERCENT REDUCTION. THE SIXTEEN PERCENT MATHEMATICAL CERTAINTY ALONE LEAVES ANYONE FAMILIAR WITH JUST WEATHER WITH THE SAME RESPECT FOR THE "SCIENTIFIC BASES" AS HAS MR. STOCKMAN WITH HIS "ON AND OFF THE RECORD" PROCLAMATIONS OF THE SUPPLY SIDE ECONOMIC PANACEA.

WE OBJECT TO THE ENTIRE MANAGEMENT APPROACH BY BLM FOR OUR RANCH AND FOR OUR PUBLIC LANDS. OUR HURT ISN'T TOO MUCH VIEWED IN THE NATIONAL INTEREST BUT THE COMBINED INJURY TO OUR NATION THAT IS PART OF THE OPIATE FED UNCLE SAM THAT THERE IS A BETTER WAY THAN WORK AND RESOURCE UTILIZATION. THE HOLISTIC APPROACH TO PROTECTING JACK AND JENNY ASSES AT THE EXPENSE OF RED MEAT FOR PEOPLE PUTS THE WHOLE PROGRAM IN TODAYS LUDICROUS AND MOURNFUL CONTEXT. ANYONE OLD ENOUGH TO HAVE LIVED THE FEARS, TRUIMPHS AND EXPECTATION FROM WWII THROUGH VIET NAM JUST SIMPLY HAS TO FALL IN TEARS IN FEAR OF WHAT LIES AHEAD FOR US IF SOMEONE, SOMEWHERE AND NOW, DOESN'T RISE ON THE SCENE AND SAY "ENOUGH, ENOUGH, GET THE BLANK OUT OF THE WORKING MAN'S WAY AND LET HIM HELP US ALL."

WHERE SPECIES, OTHER THAN THOSE PRODUCED FOR HUMAN CONSUMPTION, ARE TRULY ENDANGERED LET THEM, NO CAUSE THEM, TO BE PROTECTED. BUT WHERE THE "PROTECTION" IS TO INCREASE THEIR NUMBERS FOR RECREATIONAL SLAUGHTER, LETS AWAKEN TO OUR PLIGHT.

I SPEAK WITH THE SAME OBJECTIVITY OR PREJUDICE AS DOES A PROFESSIONAL

OUR LOWER USE OR THE PAST FIVE YEARS REFLECTS GOOD RANCHER PRACTICES, WHICH WILL CONTINUE, BUT THE SIXTEEN PERCENT FIGURE HAMSTRINGS ALL POSSIBILITY FOR USE WHEN THERE ARE FEED BONANZAS. THE SIXTEEN PERCENT SEEMS AS A DIABOLIC DEFENSE PRESENTED IN ANTICIPATION OF THE COMPLAINT--A SORT OF "WE AREN'T HURTING THEM, LOOK THATS ALL THEY USED DURING THE PAST FIVE YEARS." THAT KIND OF APPROACH TO LAND MANAGEMENT IS FOR NOVELS AND POLITICAL DEMOGOGEURY, IT IS INDEFENSIBLE IN THE REAL WORLD.

IT IS VERY INTERESTING TO NOTE THAT THE PREPARERS OF THIS E.I.S. HAVE 114 1/2 YEARS EXPERIENCE IN BLM, 3 1/2 YEARS EXPERIENCE IN US GEOLOGICAL SURVEY, 14 1/2 YEARS EXPERIENCE IN SCS, 2 YEARS EXPERIENCE IN PRIVATE CONSULTING, 2 YEARS EXPERIENCE IN ARIZONA STATE PARKS, 1 YEAR EXPERIENCE IN THE FOREST SERVICE AND 13 YEARS EXPERIENCE IN PRIVATE RANCHING. IF THIS RANCHING EXPERIENCE WAS IN ANOTHER STATE, HOW QUALIFIED CAN IT BE FOR THE LANDS AND RANCHES IN ARIZONA? JUST AS FARMING PRATICES COMPLETELY DIFFER IN THE MIDWEST THAN IN ARIZONA, SO DO RANCHINC PRACTICES DIFFER IN ARIZONA THAN IN ANY OTHER PART OF THE COUNTRY.

DOMESTIC SHEEP HAVE BEEN BLAMED FOR THE DECREASE IN BIG HORN SHEEP IN THE AREA OF THE E.I.S., I SUGGEST THAT A CLOSER LOOK AT THE LIONS IN THE AREA MAY RESULT IN THE FINDINGS THAT THEY HAVE CONTRIBUTED MUCH MORE TO THE DECREASE IN BIG HORN SHEEP THAN THE DOMESTIC SHEEP HAVE. ALSO A LOOK AT THE INSECT PREDATORS, SUCH AS APHIDS HAVE DONE MORE TO DAMAGE THE AREA THAN LIVESTOCK, FOR THIS VERY YEAR THAN ATE MORE OF THE FORACE THAN THE LIVESTOCK DID.

MY LAST REMARK WILL BE THAT ALTHOUCH LIVESTOCK PLAY A LARGE PART IN THIS E.I.S., NO PHOTO WAS INCLUDED-ALTHOUGH GRASSES, RANGELAND, IMPROVEMENTS AND MANY SPECIES OF WILDLIFE WERE WELL REPRESENTED IN THE PHOTOGRAPHY OF THE E.I.S. THAT JUST MIGHT BE A SUTTLE WAY OF TELLING WE RANCHERS OF THE UNIMPORTANCE OF OUR CONTRIBUTION TO THE ECONOMY OF THIS COUNTRY.

U. S. DEPARTMENT OF THE INTERIOR

BUREAU OF LAND MANAGEMENT

In the Matter of)
)
LOWER GILA NORTH) A PUBLIC HEARING
)
Draft Grazing Environmental)
Impact Statement)

Orchard Room No. III
Rodeway Inn, Metro Center
10402 North Black Canyon Highway
Phoenix, Arizona

Wednesday, May 5, 1982

Pursuant to Notice and Publication, the above-entitled matter came on for hearing at 7:30 p.m.

BEFORE: FRITZ GOREHAM, Esq.
Field Solicitor
Office of the Solicitor, DOI
Phoenix, Arizona

PANELISTS: BILL CARTER, Team Leader
BLM District Office
Phoenix, Arizona

BILL BARKER, Phoenix Dist. Mgr.
BLM District Office
Phoenix, Arizona

DEAN DURFEE, Lower Gila Area Mgr.
BLM District Office
Phoenix, Arizona

HEARING ASSISTANTS: KAREN DANIELS and HECTOR ABREGO
BLM District Office
Phoenix, Arizona

I N D E X

SPEAKERS	PAGE NO.
Art Arnold	6
Bob Crowder	8

E X H I B I T S

DESCRIPTION	MARKED	RECEIVED
(None)		(None)

P R O C E E D I N G S

PRESIDING OFFICIAL: Good evening. My name is Fritz L. Goreham. I'm the Field Solicitor and I've been designated to be the Hearing Officer of this public meeting for the Draft Grazing Environmental Impact Statement for the Lower Gila North.

There was a meeting held last night in Wickenburg and this is the second meeting, as provided by the public announcement.

If we have any speakers -- and there are two speakers who requested previously to speak. Is Deborah Rayburn or Steve Johnson here?

(No response)

Okay, they may come in later. Testimony will be recorded and will be made part of the submission. There is a sixty-day comment period running right now on the Draft Enviornmental Impact Statement and that comment period will end on May 21, 1982, and you are encouraged to submit written comments prior to that date and they should be submitted to the -- to Mr. Barker, the District Manager of the Phoenix District, at their office at 2929 West Clarendon Avenue in Phoenix. The zip code is 85017.

The Panel tonight tonight includes Mr. Carter, the Envirnmental Coordinator on this Impact Statement;

Dean Durfee, the Area Manager for the area covered, and Mr. Barker, the District Manager. At this time, Mr. Barker will make a statement as to the purpose of the hearing.

BILL BARKER: Okay, thank you, Fritz. As Fritz indicated, the purpose of the hearing is to receive public input on the adequacy of the Draft Stement covering the proposed livestock grazing program and alternatives for the Lower Gila North Planning Area.

The EIS is required by the National Environmental Policy Act of 1969 and responds to the 1974 Settlement of a lawsuit initiated by the Natural Resources Defense Council.

The Lower Gila North EIS is the third such statement to be completed in the Phoenix District. The other two were both in the Kingman Resource Area in Mojave and Yavapai Counties.

A Draft Land Use Plan, or Management Framework Plan, which includes the proposed rangeland management program analyzed in the Draft EIS, was completed in 1981. Final decisions on all recommendations will be made no sooner than thirty days after the filing of the Final Environmental Impact Statement with the Environmental Protection Agency.

The proposed action and four alternatives are

described and analyzed in detail in the EIS. The final decision may result in acceptance of the proposed action, or some combination of the proposed action and the various alternatives.

This decision will be announced as part of the Rangeland Program Summary, which will be published within five months of the filing of the Final Environmental Impact Statement. To meet the court-ordered schedule, the Final Environmental Impact Statement must be filed with EPA by September 30, 1982.

PRESIDING OFFICIAL: As I stated previously, we had two speakers who had submitted written requests to speak. I don't believe they're here.

I'm going to call these other names, in case you choose to speak. I know Mr. Crowder is not here. He went to get a jacket, so I'll wait for him.

Art Arnold?

ART ARNOLD: Here.

PRESIDING OFFICIAL: Do you desire to speak?

ART ARNOLD: I'd just like to ask Bill a question.

PRESIDING OFFICIAL: Could you go up there to the microphone, so that it will be on the record? We -- questions are really not in order. We are going to have a question and answer period off the record, at the close, that you

could ask any one of these three gentlemen some questions. But any comments you would want to make now would be comments directed toward the Statement.

ART ARNOLD: I would like to ask Bill a question on the record.

BILL BARKER: Let's go ahead.

PRESIDING OFFICIAL: All right, fine. Go ahead.

ART ARNOLD: My name is Art Arnold, Buckeye, Arizona, Star Route.

Bill, I just wondered that what we discussed and were in the minutes of the Advisory Board meeting, if that would be considered a written statement and be used as such for the -- for this Statement?

BILL BARKER: Yes, it will, Art. We will consider the contents of that board meeting to be comments on the Environmental Impact Statement to the extent that they did apply to it, and they will be considered in the Final Statement.

ART ARNOLD: Okay, thank you, Bill. That'll save me a lot of writing.

BILL BARKER: Okay.

PRESIDING OFFICIAL: Tommy Martin, Arizona Cattlegrowers Association?

TOMMY MARTIN: We'll be handing in a written

PRESIDING OFFICIAL: Okay. By May 21st?

TOMMY MARTIN: By May 21st.

PRESIDING OFFICIAL: All right, fine. Fred, I hope I pronounce your last name right -- Rothermel?

FRED ROTHERMEL: Yes, that's right.

PRESIDING OFFICIAL: Arizona State Land Department?

FRED ROTHERMEL: Yes. The Land Department will send in written comments later.

PRESIDING OFFICIAL: Okay. And Patricia Berthold?

PATRICIA BERTHOLD: We'll be sending written comments in also from the Governor's Rangeland Advisory Council.

PRESIDING OFFICIAL: Okay. Mr. Crowder was the first one here, and he went to get his -- there he is. Mr. Crowder, do you desire to speak on the record?

BOB CROWDER: Not now. I'll listen to some of the other conversation first.

PRESIDING OFFICIAL: I don't think there's anybody left.

(laughter)

BILL BARKER: We've just had the conversation.

PRESIDING OFFICIAL: The two scheduled speakers are not here right now and none of the other people -- they

are all going to submit written statements. So if you desire to speak, you're right welcome to.

BOB CROWDER: I don't have anything to say. I'll do mine in writing, too.

BILL BARKER: Bob, for your information, Art has just confirmed that the comments regarding the Impact Statement from the Advisory Board meeting, that were included in the minutes, will be considered as comments for the purposes of this Draft and will be included in the Final Statement.

BOB CROWDER: Well, that's good news, because if we can do that, then we've made our comments. We've picked this thing to pieces as well as we could, and made quite a few comments in the last Advisory Board meeting.

Art and I, especially, and the whole Board are trying to protect the cattlemen on this thing and yet, live with this environmental impact study.

PRESIDING OFFICIAL: At this time, I'm going to suggest -- we're going to give Rayburn and Johnson a little time. But we will go off the record now, in case you have any questions that you want to ask the Panel about the Statement.

(Off the record)

PRESIDING OFFICIAL: It's 7:49. We're going to

keep open until 8:00 o'clock, waiting for Deborah Rayburn or Steve Johnson to get here. Maybe they have decided to submit written comments, instead. So we'll keep it open until 8:00 o'clock and if they haven't shown by then, we'll adjourn.

(Questions and answers were resumed during the period specified above.)

PRESIDING OFFICIAL: We'll go back on the record. It's 8:00 o'clock and neither Deborah Rayburn of the Arizona Farm Bureau or Steve Johnson, Defenders of Wildlife, who had previously requested to speak at this hearing, have shown up, so we'll consider this hearing closed.

(Whereupon, the hearing was closed.)

C E R T I F I C A T E

THIS IS TO CERTIFY THAT the foregoing proceedings in the matter of the Draft Grazing Environmental Statement, Lower Gila North, were held as herein appears, and;

THAT the foregoing pages 1 through 9 are a true and correct transcript of my stenographic materials taken at the time and place hereinbefore written.

Charles Emmons
CHARLES EMMONS & ASSOCIATES
GSA Contract Reports

RESPONSE - ADVISORY BOARD MINUTES

M-1 See Errata entry 1. Also, see Appendix 5, pages 138 and 139 for individual allotment figures.

M-2 See Errata entries 2 and 4.

MINUTES

PHOENIX/LOWER GILA RESOURCE AREAS
GRAZING ADVISORY BOARD
APRIL 7, 1982

The Phoenix/Lower Gila Resource Areas Grazing Advisory Board met in the conference room of the Phoenix District Office at 2929 West Clarendon Avenue, on Wednesday, April 7, at 9:05 A.M.

Advisory Board Members present were

Arthur Arnold — Ted Hazen
R. E. Crowder — Charles W. Reeves

Bureau of Land Management personnel present were:

William K. Barker, District Manager, Phoenix District
Lee Higgins, Staff Range Specialist, Phoenix District
Robert Archibald, Area Manager, Phoenix Resource Area
Bob Mitchell, Range Conservationist, Phoenix Resource Area
Kyle Mohan, Range Conservationist, Lower Gila Resource Area
Russ Miller, Range Conservationist, Lower Gila Resource Area
Jack de Golia, Public Affairs Officer, Phoenix District

Visitor Present was:

Susan Murphy, reporter, Phoenix Gazette

Chairman Arnold called the meeting to order at 9:05 A.M. and called on Barker for opening remarks and introductions. He introduced Jack de Golia who in turn introduced Susan Murphy from the Phoenix Gazette. Barker also introduced other BLM personnel present. He said Oean Durfee was not present because he is attending the Governor's Rangeland Advisory Council meeting. Their agenda includes a number of BLM-related subjects. Roger Taylor, Area Manager of the Kingman Resource Area, is also attending that meeting. Barker said Lee Higgins will take care of the items normally handled by Durfee.

Chairman Arnold called on Higgins for the first item on the agenda.

Agenda Item No. 1 - Review of the Lower Gila North Grazing EIS

Higgins stated the purpose for this review of the Lower Gila North Grazing EIS is to get comments from the Board. Lee gave a brief background of the Oraft EIS - began working on it in September 1981 and completed Oraft EIS March 20, 1982. We are now in the 60-day comment period which expires May 21. There are two public hearings scheduled - May 4, 7:30 p.m., at Wickenburg, and May 5, 7:30 p.m. at Phoenix. Any comments will be considered and incorporated into the final EIS scheduled for filing with the Environmental Protection Agency in September, 1982. The Range Program Summary (RPS) is scheduled to be issued in January of 1983.

Higgins told the Board the main objectives of the EIS and listed the five rangeland management alternatives: (1) Proposed Action; (2) No action; (3) Intensive Grazing; (4) Seasonal Grazing (Ephemeral Option); and (5) No Grazing.

M-2

Arnold referred to page 1 of the Draft EIS and read the following sentence: "Stocking at this level would reduce livestock 16 percent from authorized grazing preference." Said there is nothing in this paragraph concerning those who are presently managing their allotment real well, and that a lot of the allottees are not running close to the grazing preference. Crowder inquired about the time period involved in the 16 percent reduction. Higgins explained the process involves a 5-year period. Hazen expressed his concern that if BLM personnel move on, retire, etc. as time goes along, the next person's interpretation might be different. He thought it should be restated in the EIS to clarify the statement. Barker said the proposed action is not the decision - could be changed entirely. Told Board any comments will be accepted and welcome.

Arnold referred to a statement made by Higgins that the 16 percent reduction does not apply across the board and thought action should be taken to clarify this statement in the EIS. Crowder felt the wording should be revised to state "stocking reduced an average of 16 percent depending on the conditions of the ranges." He felt what ranchers are up against is the fact they are working with a good BLM team now but don't know what the future holds which, he felt, is the key to the whole thing. Suggested this rewording be done before the final hearing. Higgins informed Board when the EIS comes out in final, changes will show as an addendum to the draft EIS.

Barker read from page 23 of EIS as follows: "The Proposed Action allocates forage on 79 allotments in the EIS area. Livestock would be allocated 49,051 AUMs, a 16 percent reduction from the authorized grazing preference of 58,155 AUMs. Adjustments would vary by allotment from an increase of 305 percent to a decrease of 78 percent. ." Crowder suggested putting language in there to clarify "varies by allotment." Arnold said anybody that picks up EIS book will read only the summary part and not the whole thing, and the summary hardly has one thing that gives the permittee any praise for what he has done in the past or help for what he is going to do. All is derogatory and it should not be published that way.

Crowder referred to the paragraph just read by Barker - the last sentence of that paragraph is almost a mandate - "Further livestock reductions to improve condition and trend on these allotments would be expected as soon as BLM gathers the needed field data." Crowder felt this leaves no room for argument, and that future BLM personnel would not understand what they are doing. Is fearful of interpretation of other people in later years. He inquired if public is entitled to know what report cost. He would like to know what the cost of the EIS is. Discussion on costs followed. Barker informed Crowder BLM can provide Board with EIS costs.

Crowder commented most stockmen hate to get into paperwork and that there are a lot of people who don't read and understand these things. He felt the first few pages are going to make the reader (stockman) boiling mad and if we can give them some reference or referrals to these types of things, then felt we are going to accomplish a lot more. Barker said the wording can be changed to show it's not a 16 percent reduction in every allotment.

Lee continued with the review of the EIS and referred to page 20 of the EIS where there is a table that corresponds to the proposed action. Arnold referred to the Intensive Grazing Management and felt it should have something in there to make it more clear. Barker replied this is a statement of the environmental impact of several proposed alternatives and not intended to be all inclusive as to how we go about implementing all the alternatives.

Crowder referred to page 27, Monitoring Program, and the last paragraph on the page where it says "Within the EIS area, ephemeral blooms, greatly influence utilization of key perennial forage, resulting in low utilization when ephemeral forage is abundant and high utilization when ephemeral forage is scarce. The above formula must therefore be applied with discretion. To mitigate the effects of fluctuating ephemeral growths stocking increases or decreases would generally be held to a maximum of 15 percent in any one year, consistent with regulations, as a result of information gathered from utilization studies."

Crowder questioned why a limit of 15 percent on the ephemeral because to him when ephemeral goes, it is gone. Barker explained to him, not more than 15 percent is the grazing preference, based upon the perennial growth. Crowder stated what if Barker retires, the new man would not understand what EIS statement is getting at and would not understand it correctly. Barker assured him it would be understood. Arnold stated there have been people here before that would not have understood that. Arnold stated what Board is after is to write it in the EIS like you tell it is instead of the way it is written in the EIS. Barker pointed out to him it is written the same way as we are saying. Arnold suggested to write in the EIS that a reader can't get the information out of just the summary part but would have to read the whole EIS.

M-1

Crowder referred to page 28 and quoted part of a paragraph ". . . On a year-to-year basis, whenever forage exists or climatic conditions indicate the probability of an ephemeral forage crop, livestock grazing would be authorized upon application, subject to management requirements for the allotment." Felt paragraph was fine up to this point but objected to: "BLM would require ephemeral allotments to be rested from June 15 to October 1 every year and would reserve sufficient ephemeral forage to meet the needs of wildlife, wild burros, and other resources. . ." Suggested this be changed to add "normally" June 15 to October 1 but does not

like limiting to a shut-off date as there are years when there are summer rains that make the best stocking time from August to October and no winter ephemerals. Suggested it should be changed to read "if ephemeral is there, it is up to Department to so state." He felt shut-off date should be left up to Department (BLM). Hazen stated this same thing could apply to perennials as well as ephemerals. Felt that non-use of perennials, after they get to a certain size, could actually stagnate growth of the perennials. He felt there are times when plants need to be stimulated by use and during that time, use would be much more beneficial than in the winter time. Crowder agreed that plants can suffer as much from underuse as they can from overuse. Barker said it would be appropriate for Board to recommend that the dates be changed. Crowder felt there should be no dates - be up to range and the allottee and, if possible, allottee should have right to arbitration, being fair to both management and the allottee.

Higgins explained to Board how the alternatives came about - some are classified for seasonal use only to prevent losing preference. After discussion, Board agreed it was all right to leave it the way it is written.

Higgins referred to a Table on page 34 that shows the Intensive Grazing Management Summary. He quoted from paragraph ". . . By sharing development costs with the operator, BLM could take advantage of the operators' lower labor and construction costs to improve benefit-cost ratios. Because of the joint funding by BLM and the affected operators, implementing this alternative would require the approval of individual livestock operators . . ." Higgins said this is something BLM is in favor of pursuing. Hazen stated he feels the public thinks the cowman and farmer should work for substandard wages and if they want something done cheap, get the farmer/rancher to do it. Hazen said ranchers pay a good price for everything they need to buy. Does not like the concept in the above-quoted sentence. Felt Government and public should make a little adjustment on it. Hazen felt the rancher is going to be expected to bear the brunt. Higgins explained to him that was not the intent of the above statement. Hazen still felt the load is going to be on the rancher. Barker explained to Hazen that another factor and main reason behind it is that BLM is being looked at more and more closely from a cost effectiveness standpoint. Each allotment is subjected to cost-benefit analysis and if we don't come out one to one or better, it won't be done. He explained the point Oean is making is when BLM goes to build a stockpond fence, it immediately runs into the Davis-Bacon Act, Small Business Administration, and other restrictions. There is a lot involved for BLM to get the job done. Hazen felt the rancher should get some recognition for some of the things they do. They can make improvements cheaper and better than the government can do them.

Crowder discussed improvements and the fact that some ranchers do not have money to make range improvments in which case they would benefit by the government sharing the expense of the improvement. However, if they

(ranchers) don't have money to help with range improvements, Crowder felt they don't have to do it. Barker stated all they have to do is keep up the improvements already there. Stated BLM can't force ranchers to spend any money on the allotment nor does it want to. Crowder discussed the problem of having to pay union wages and that a lot of the labor doesn't know how to do what they are hired to do. Also remarked every time water is developed to help the ranchers, wildlife also benefits, but there is no recognition. Mohan stated if it is worth it to the rancher to drill a well, BLM will get the job done with help in funding from the rancher - can be in the form of equipment, etc. Board felt rancher could drill a well for at least 50 cents less on the dollar than BLM can.

Crowder discussed the CAP fence which cost about $5,000 a mile to build and which the rancher could have done for about $1500/mile. He felt it is a lot cheaper to let ranchers do the work themselves.

Crowder called attention to the Intensive Management Table on page 20. Wanted alternative cost in there to share expense with allottee. Higgins discussed alternatives. Crowder referred to comments on page 66 on Affected Environment. He said calf crops could vary under different conditions - for example if raised in higher elevations versus lower elevations. There could be a drought in the South and not in the North so felt these figures are not right. He thought it behooves all of us to talk to our neighbors and anybody that has an allotment and ask them to read the Oraft EIS from cover to cover and get some comments in before the comment period expires. Most ranchers don't have time to read the EIS and then "holler their head off" after the fact.

Arnold again said he felt ranchers need a lot more recognition. Higgins again informed him there are two public hearings scheduled - one at Wickenburg on May 4th and one at Phoenix on May 5th and suggested Board attend if at all possible. Both meetings are scheduled for 7:30 p.m.

Arnold said the BLM boys ought to be complimented for the fine presentation they did on the Oraft EIS as it took a lot of work, the EIS has good taste, and involved a lot of effort. Crowder and Barker agreed.

Meeting was recessed at 10:00 for coffee break. Reconvened at 10:30 a.m.

Agenda Item No. 2 - Review of the Rangeland Monitoring Plan

Higgins briefly discussed the monitoring plan. BLM will be monitoring rangeland forage instead of basing any actions on a one-time rangeland inventory. The preferred alternative would be that livestock numbers be held at the current levels while BLM range conservationists monitor forage use. The livestock numbers would then be adjusted so that an average of 50 percent of the forage is utilized.

Agenda Items No. 3 & 4 - Status of Range Improvements - F.Y. 82 and Proposed Range Improvements - F.Y. 83

Kyle Mohan, LGRA, handed out a list of Range Improvements being done this year in Lower Gila Resource Area (Attachment #2). Crowder inquired if

all of the projects scheduled for FY 81 were completed. Mohan informed him all of the ones that BLM had funding for were completed. The uncompleted ones have not been thrown out but are still on the list. Projects will be accomplished from grazing fee money (8100 funds). Mohan explained the status of each of the scheduled projects for completion in FY 82 and discussed the setbacks experienced due to the Young Adult Conservation Corps (YACC) being abolished as of March 26, 1982. BLM still has a small force account crew working in Kingman and one maintenance man with a temporary assistant working in Phoenix. With the YACC program abolished, it makes it harder to accomplish all of the programmed projects. Arnold inquired if anyone ever put a pencil to 8100 funds to determine if we actually are getting the correct share of the 8100 funds. Barker did not feel there was a problem here. Mohan discussed each project and status of each. The last three on the F.Y. 82 list are carryovers from previous years.

Mohan passed out a list of range improvements scheduled for F.Y. 1983 (Attachment No. 3). He discussed each allotment with Art Arnold prior to coming up with the list.

Bow Jon windmills were discussed and the problems encountered with them. They take a lot of wind to start and will run a long time before water reaches the surface. Consensus was that they are not too satisfactory.

Bob Mitchell reported on the Status of Range Improvements in Phoenix Resource Area (PRA) for FY 1982. PRA is still working on existing allotment management plans. Mitchell distributed a sheet describing the range improvements scheduled for FY 82 and FY 83 (Attachment #4). He gave the status of each improvement scheduled. There are four to be completed in FY 82 and three scheduled for FY 83.

Agenda Item No. 5 - Review of Maintenance Policy on Rangeland Improvements.

Higgins passed out an Instruction Memorandum, W.O. No. 82-296, Chg. 1. (Attachment #5). He discussed highlights with the Board. Allottees are responsible for maintenance of structural improvements. Next year will be the last year BLM can spend 8100 money for maintenance of structural projects. He referred to page 5 of the memo which gives the definition of structural and non-structural rangeland improvement.

Structural: An improvement requiring placement or construction in order to facilitate management or control distribution and movement of livestock.

Nonstructural: A practice or treatment which improves rangeland conditions and/or production.

Higgins will send a letter out to all allottees sometime in the near future and describe the new policy. Crowder thought this would be a good idea and also to send a copy of the instruction memo passed out to the Board. However, since the memo is quite long, Higgins will summarize it.

Agenda Item No. 6 - Review Policy on the Oistribution of 8100 funds

Higgins referred to page 7 of the Instruction Memo which states the objective of using 8100 funds which is to improve forage conditions with resulting benefits to wildlife, watershed protection, and livestock production. Funds should be used for on-the-ground rangeland improvements, pursuant to Sec. 401 of FLPMA. Also described allowable uses and non-allowable uses.

Higgins briefly explained the difference between the old method and new method of the distribution of 8100 funds. Under the old method, out of every dollar collected for Sec. 3, 50 cents went to the 8100 fund (.25 to district and .25 to general 8100 fund). Under the new method, 50 cents comes back to the State for 8100 fund (based on 50% of grazing fees collected) and State Oirector has authority to shift around within state as long as over a given period of time each Oistrict gets its share. Barker stated there are really three principal sources - 8100 money appropriated, 4322 (grazing account) and sometimes project money is appropriated in the watershed account.

Hazen said he thinks we are going to see the end of a lot of emphemeral grazing as it is getting harder and harder to ship in Mexican cattle to put on ephemeral range. They are starting to keep them in Mexico.

Crowder inquired if it would be much trouble for BLM to periodically send the Board the amount of money by County in the Advisory Board fund under their jurisdiction. He felt the Board ought to have this information. Barker suggested having this information available at each Advisory Board Meeting. Hazen asked about expenditure of advisory board funds where allotments overlap more than one county. Barker stated that Advisory Board funds are distributed to counties based on the number of public acres in each county. He also stated that he believed an agreement between the Phoenix/Lower Gila Grazing Advisory Board and the Kingman Grazing Advisory 8oard had been reached whereby for those allotments overlapping county lines around the Bill Williams River, those allotments administered by Lower Gila would be eligible to receive range improvement funds administered by the Lower Gila Advisory Board and vice versa for those overlapping allotments administered by Kingman. (Further research revealed that such an agreement between the two Advisory Boards was approached but was found to be in violation of existing laws governing the expenditure of Advisory Board funds. These funds must be spent in the county from which they originated).

Agenda Item No. 7 - Report on Vandalism of Range Improvements

Barker brought Board up to date on this subject. Some time ago, the Advisory Councils were organized for each district and one bureau-wide advisory council. Right now they are in limbo due to rechartering and reviewing nominations. When the council was set up in this district, they brainstormed types of subjects they felt were important for the council to get involved in. One that surfaced was the problem defined as rangeland vandalism (shooting up windmills, storage tanks, four-wheel drive vehicles damaging watershed improvements, cutting fences, etc.). The Council later decided to pursue the problem and as a result had a public meeting in a hearing format in Kingman last October jointly with Kingman Grazing Advisory Board. About 80 - 100 people attended the meeting. A lot of interest was shown on all sides of the issue. The Council made a number of recommendations and some of those were things that the 8ureau can do, such as encouraging allottees to report these types of vandalism to local sheriffs. Some things BLM does not have control over. For example, if

game warden arrests someone, the local county attorney won't process case or, if he does, the judge turns the arrested person loose. Was suggested talking to some of the people running for county attorney and find out what their interests are on this type of a problem. Barker said the vandalism issue was discussed at the recent management meeting - whether Phoenix Oistrict is to go alone or whether other districts might be interested also and then go on a state-wide basis. The decision was to take the issue up as a state-wide program and broaden the scope of it to include all forms of vandalism on public lands and we will be seeing a lot more on this. We need a larger percentage of people to get involved in doing something about it like reporting license numbers, go directly to sheriff or local game warden, HOW (Arizona Game & Fish program) which utilizes bumper stickers with a hot line telephone number to call, etc. Barker felt the best solution is to get conviction and publicity to impress rest of small percentage who are vandals. Also need cooperation of the Justice of the Peace. Suggested ranchers should get specific examples. It would also be very beneficial to let elected officials know what the problems are. Barker said BLM will send out finalized plan in the near future for the Board to review.

Hazen inquired how the Advisory Council is selected and Barker explained nomination process to him and that the Secretary of the Interior makes the final selection.

Arnold inquired if the EIS was sent out to all permittees. A copy was sent to all permittees in the Lower Gila North area, and to other allottes by request only. Arnold said Board should contact as many people as possible and ask them to read the Draft EIS.

Agenda Item No. 8 - Arrangements for Future Meeting

Crowder suggested that instead of setting a firm meeting date now, rather set a meeting date when BLM gets a feel of when the EIS is nearing completion. Board agreed. It was tentatively agreed upon that a meeting may be held in November or early December. If an emergency comes up in the meantime necessitating a meeting, BLM will notify Board and schedule a meeting sooner.

de Golia inquired of Board whether they wanted to keep on receiving the news releases being sent to them. Crowder stated he likes to receive them to keep in touch with what is going on. Hazen replied some of the releases he liked and some appeared to him to be quite trivial.

With no further business, Chairman Arnold adjourned the meeting at 11:45 A.M.

APPROVED:

Arthur Arnold

Arthur Arnold, Chairman
Phoenix/Lower Gila Resource Areas
Grazing Advisory Board

WRITTEN COMMENTS

Written comments received on the draft EIS have been reproduced on the pages that follow and comments pertaining to the adequacy of the draft EIS have been numbered. BLM's responses to those comments follow comment letter 18 and are identified by corresponding numbers.

BLM expresses its thanks to those who took time to review the draft EIS and to submit comments on the analysis or the proposal.

The following agencies, organizations, and individuals submitted written comments.

Letter No.	
1	National Council of Public Land Users
2	Kent Woodruff, Wildlife Biologist
3	Bureau of Reclamation
4	John W. Simpson
5	Defenders of Wildlife
6	Arizona State Clearinghouse
7	Wildlife Management Institute
8	Mrs. Ed Weiler
9	Arizona State Land Department
10	U.S. Environmental Protection Agency
11	University of Arizona, Range Research Task Force
12	Maricopa Audubon Society
13	Yuma Audubon Society
14	The Wildlife Society, Arizona Chapter
15	Arizona Wildlife Federation
16	Wild Horse Organized Assistance
17	Arizona Game and Fish Department
18	Governor's Rangeland Advisory Committee

1

National Council of Public Land Users

P. O. Box 811
Grand Junction, Colorado 81501

Paul Maxwell, President

Herbert Snyder, Secretary

31 Mar 82

Mr. W. K. Barker, District Manager
BLM Phoenix District Office
2929 West Clarendon Avenue
Phoenix, AZ 85017

Dear Sir:

The Arizona Lower Hila North Environmental Impact Statement on livestock grazing on the National Resource Lands has been reviewed.

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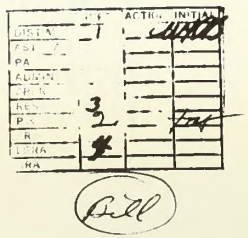
1-1 It is inconceivable that people who administer the use of public lands should be so ignorant of the effects of "Climate". The short paragraph on Page 41 does nothing to indicate the solar and wind evaporation rate for the area. Certainly the "land managers" are not ignorant of the fact that it is the relationship between precipitation and natural evaporation that makes a geographical area a desert and should not be grazed. Why is this important information always omitted? Of course, when government money can be obtained to "manipulate nature", it can be a bottomless pit. Increased AUM's can aggravate the problem.

Government subsidization of Western desertification by domestic livestock is national suicide. There is no justification for its continuance.

Yours truly
Herbert Snyder
Secretary

Copy to: James Watt, Secretary of Interior
Tom Allen, Acting State Director
Natural Resources Defense Council
Public Lands Institute
Wildlife Conservation Coalition, Inc.
David Stockman, Budget Director

BLM
PHOENIX DISTRICT
APR 7 '82

2

April 5, 1982

District Manager
BLM Phoenix District Office
2929 W. Clavendon Ave.
Phoenix, Ariz 85017

Dear Mr. Barker:

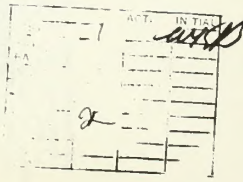
2-1 The Proposed Action for the Lower Gila North EIS appears to be a good choice considering the alternatives. There is however one problem area which will need to be corrected as soon as possible with implementation of the Proposed Action. This involves riparian habitat quality. On page 4, under the Wildlife Section in the Summary, a statement is made that "Riparian habitat quality would continue to deteriorate along present trends in the short term.....". Considering the extreme value that riparian habitat has for wildlife, water quality and soil stability, especially in desert areas; and the amount of crucial wildlife habitat that occurs in riparian areas; and the amount of riparian habitat that is already in poor-fair condition (45%), it appears that steps should be taken immediately to begin improving the quality of riparian habitat in the EIS area.

Most Sincerely,

Kent Woodruff

Kent Woodruff
Wildlife Biologist
Baker, Oregon 97814

BLM
PHOENIX DISTRICT
APR 8 '82



3

United States Department of the Interior

BUREAU OF RECLAMATION
LOWER COLORADO REGIONAL OFFICE
P.O. BOX 427
BOULDER CITY, NEVADA 89005

IN REPLY REFER TO LC-155A
565.

APR 13 1982

Memorandum

To: District Manager, Bureau of Land Management, Phoenix District Office, 2929 West Clarendon Avenue, Phoenix, AZ 85017

From: ACTING Regional Director

Subject: Lower Gila North Draft Grazing Environmental Impact Statement (your letter dated March 19, 1982)

We have reviewed the subject document and find no impact on Bureau of Reclamation activities. The document appears adequate for the purpose intended and we noticed no deficiencies or errors significant enough to comment on.

Roy D. Gear

BLM
PHOENIX DISTRICT

APR 15 '82

	FYI	ACTION	INITIAL
DIST MGR			
AST DM			
PA			
ADMIN			
OPER			
RES M			
P & EC			
PHA			
LGRA			
RA			

33

4

District Manager
Bureau of Land Management
Phoenix District Office
2929 W. Clarendon Ave.
Phoenix, Ariz. 85017

4/22/82
Wickenburg, Ariz 85390

Dear Sir:

4-1 In regard to your findings for the Sitgreaves-Red Hill allotment, your allocation in AUMS, I am sure are based on the years of past usage. This AUM rating is very low, due to the fact that in the years passed, this allotment was used seasonally for sheep only, and for a short period of time on the years when there was excellent feed. The sheep would come from irrigated pastures on the years of excellent feed and then on to the high country for the breeding season.

We, of the Sitgreaves allotment have changed our operation from sheep to cattle, and our usage of the allotment has also changed. We are in the process of developing permanent waters on the Sitgreaves allotment, and we are striving to work out a rotation plan with the Bureau of Land Management, so that with the Garcia allotment and the Sitgreaves allotment, we will have better usage and control of the animal grazing and also in doing so, the permanent waters will be a big asset, not only for better grazing, but also for wildlife.

Sincerely
John W. Simpson

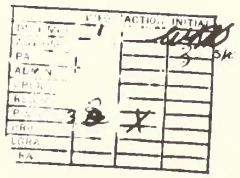
5

Defenders OF WILDLIFE

13795 N. Como Dr.
Tucson, AZ. 85704

BLM
PHOENIX DISTRICT
APR 30 '82

April 29, 1982



District Manager
Bureau of Land Management
Phoenix District Office
2929 W. Clarendon Ave.
Phoenix, AZ. 85017

Dear Sir:

Defenders of Wildlife supports the efforts of the BLM to intelligently manage the ferol burro population. Consequently, we support the planned reduction of burro AUMs from 3,600 to 1,260 AUMs. Though it is probably impossible at the present time, we also wish that the 3,139 cattle currently on the Lower Gila North could also be reduced by 65%. From the viewpoint of area economics alone, the small income loss to the area residents would be more than offset by the increased production of big game and small game, and the increased hunting revenue that would come as a result.

From long observation of the unwarranted political pressures brought to bear on BLM employees by both local residents and distant politicians, Defenders of Wildlife questions the ability of the BLM to 1) obtain the funding for the extensive monitoring, fencing, and other improvements planned under the P.A. and 2) to carry out the actual cattle reductions that will probably be warranted should actual monitoring be conducted.

5-1 Therefore, we urge that the following change be made in the P.A. as described in the Final draft of the EIS for the Lower Gila North. Instead of allowing the initial stocking rate to be equal to the average licenced use for the past five years, reduction in livestock AUMs should immediately be made for the following reasons:

1) Under the P.A. 11,489 AUMs are allocated for big game, where none were allocated before.

2) Under the P.A. BLM proposes to fence out cattle from riparian areas, lower cattle use of bighorn habitat, and manage for crucial tortoise-habitat.

34

The above actions are commendable and long overdue, but they will be nothing more than paper reductions unless the AUMs necessary for their implementation are immediately not only allocated but subtracted from the cattle AUM allocation. The planned monitoring could then be carried out, and cattle AUMs restored as the vegetation allows. This more rational and prudent approach would allow for faster recovery of the land, and would be of benefit to wildlife as well as cattle. An important side benefit would be that it would be to the cattleman's advantage to use his influence to gain funding. Under the present Draft of the EIS, it would perhaps be advantageous for some ranchers to oppose funding. Defenders of Wildlife therefore recommends that at least 11,489 AUMs be subtracted from the 49,051 AUMs of Average Licenced Use.

The desert tortoise, in Defenders' opinion deserves special attention. Of the 24 allotments singled out by the BLM as "crucial tortoise habitat", only 29% is rated as Good to Excellent in range condition, with 2/3 of the allotments in a static condition. Despite the fact that tortoises have not increased in the area for 35 years, the P.A. provides for no immediate reduction in the level of actual use by cattle.

5-2 According to the AUMs listed in the P.A. on p.132, a total of approximately 2,252 cattle will be sharing the 24 allotments designated as crucial habitat for the desert tortoise. Since only 3,139 cattle actually use the entire EIS area each year, this means that over 71% of the total cattle for the entire Lower Gila North area are concentrated on the 7.9% of the area also designated for crucial tortoise habitat.

Since both the tortoise and the great majority of the management area's cattle seem to depend on the same small areas, how can BLM justify no immediate real reduction of cattle?

Assuming an AUM cost of $2.31, the Lower Gila North earns $113,307 per year in grazing fees, or about 8 cents per acre per year on the average. The 27,024 cattle AUMs that use the tortoise habitat contribute $62,425 per year, or about 57 cents per acre per year. The average acreage needed per year per cow for the entire EIS area is 438 acres. On the tortoise habitat it's only 48.7 acres/cow.

5-3 The area designated as crucial tortoise habitat thus has nearly nine times the stocking rate as the Lower Gila North as a whole. If these 24 allotments are truly crucial habitat for the tortoise, reductions in livestock numbers are needed immediately, not in five years.

Of all the forms of wildlife that are attempting to survive on the Lower Gila North Planning Area, none demands less for survivial than the desert tortoise. The animal hibernates for most of its life, and requires only that a small amount of forage be present for a part of the year. The fact that

this innocuous and undemanding species is in trouble on this management area is a clear indictment of past and present grazing practices. No further "monitoring" of range conditions is needed to know that an immediate real reduction of cattle numbers is urgently required now.

In the long run, and long after the present administration is forgotten, what's left of the natural ecosystem we now call the Lower Gila North will still be there. Though burros are partly to blame for its present conditions, it's clear that even an average of one cow per 438 acres is too much. However, it's not the cow's fault, or even the rancher, most of whom must have another job to support their cattle habit. The fault lies with the BLM and the hunter and the general public for allowing such a small group of users to so dominate and abuse a resource belonging to all. In the future, it is to be hoped that the cattleman and his influence moves much closer to his true economic influence. When this happens, multiple use will finally have arrived.

Thank you,

Steve Johnson

Steve Johnson
Southwest Representative

6

Responses from Arizona State Clearinghouse

No Letter of Comment from:

Agriculture and Horticulture Department
Arizona Natural Heritage Program
AORCC
Department of Health Services
Department of Transportation
Department of Water Resources
Maricopa Association of Government
Northern Arizona Council of Governments

Letters of Comment from:

State Land Department (see Letter 9)
Arizona Game and Fish Department (see Letter 17)
Governor's Rangeland Advisory Committee (see Letter 18)

SIGNOFF

OMB Approval No. 29-R0218

FEDERAL ASSISTANCE

2. Applicant's application — a. Number — b. Date 19 (Year Month Day)

3. State application identifier: AZ 82-60-0032 — b. Date Assigned 19 82 03 24 (Year month day)

Leave Blank: MAY 06 1982 — Janice L. Blum

1. Type Of Action (Mark appropriate box): ☐ Preapplication ☐ Application ☐ Notification Of Intent (Opt.) ☐ Report Of Federal Action

Section I - Applicant / Recipient Data

4. Legal Applicant/Recipient
a. Applicant Name: Bureau of Land Management
b. Organization Unit: Phoenix District Office
c. Street/P.O. Box: 2929 W. Clarendon Ave
d. City: Phoenix — e. County: Maricopa
f. State: Arizona — g. Zip Code: 85017
h. Contact Person (Name & telephone no.): W.K. Barker, District Manager (602) 241-2501

5. Federal Employer Identification No.

6. Program (From Federal Catalog)
a. Number 15.999
b. Title Unknown
DOI, Bu. of Land Management

7. Title and description of applicant's project: LOWER GILA NORTH-Draft Grazing Environmental Impact Statement

BLM proposes to implement a grazing management prog. for the Lower Gila North Planning Area in Maricopa, Yuma, Yavapai, and Mohave Counties, Arizona. The area encompasses 1,393,000 acrea of public land, 847,000 acres of state land and 442,000 acres of private land.

8. Type of applicant/recipient
A-State; B-Interstate; C-Substate District; D-County; E-City; F-School District; G-Special Purpose District; H-Community Action Agency; I-Higher Educational Institution; J-Indian Tribe; K-Other
(Specify): Federal Agency — Enter appropriate letter: k

9. Type of assistance
A-Basic Grant; B-Supplemental Grant; C-Loan; D-Insurance; E-Other
Enter appropriate letter(s): e

10. Area of project impact (Names of cities, counties, states, etc.): Maricopa, Yuma, Yavapai, and Mohave Counties, Arizona

11. Estimated number of persons benefiting

12. Type of application
A-New; B-Renewal; C-Revision; D-Continuation; E-Augmentation
Enter appropriate letter: a

13. Proposed Funding

a. Federal	$	.00
b. Applicant		.00
c. State		.00
d. Local		.00
e. Other		.00
f. Total	$	.00

14. Congressional Districts Of:
a. Applicant — b. Project

15. Type of change (For 12c or 12e)
A-Increase Dollars; B-Decrease Dollars; C-Increase Duration; D-Decrease Duration; E-Cancellation; F-Other (Specify):
Enter appropriate letter(s):

16. Project Start Date (Year month day) 19

17. Project Duration (Months)

18. Estimated date to be submitted to federal agency (Year month date) 19

19. Existing federal identification number

20. Federal agency to receive request (Name, city, state, zip code)

21. Remarks added ☐ Yes ☐ No

Section II - Certification

22. The Applicant Certifies That

a. To the best of my knowledge and belief, data in this preapplication/application are true and correct, the document has been duly authorized by the governing body of the applicant and the applicant will comply with the attached assurances if the assistance is approved.

b. If required by OMB Circular A-95 this application was submitted, pursuant to instructions therein, to appropriate clearinghouses and all responses are attached.

	No response	Response attached
(1) Arizona State Clearinghouse	☐	☒
(2) Region I (MAG), Region III (NACOG),	☐	☒
(3) Region IV, (Dist IV) Clearinghouses	☒	☐

23. Certifying representative
a. Typed name and title — b. Signature — c. Date signed (Year month day) 19

Section III - Federal Agency Action

24. Agency name — 25. Application received 19 (Year month day)

26. Organizational Unit — 27. Administrative office — 28. Federal application identification

29. Address — 30. Federal grant identification

31. Action taken
☐ a. Awarded
☐ b. Rejected
☐ c. Returned for amendment
☐ d. Deferred
☐ e. Withdrawn

32. Funding

a. Federal	$	.00
b. Applicant		.00
c. State		.00
d. Local		.00
e. Other		.00
f. Total	$	.00

33. Action date 19 (Year month day)

34. Starting date 19 (Year month day)

35. Contact for additional information (Name and telephone number)

36. Ending date 19 (Year month day)

37. Remarks added ☐ Yes ☐ No

38. Federal agency A-95 action

a. In taking above action, any comments received from clearinghouses were considered. If agency response is due under provisions of Part 1, OMB Circular A-95, it has been or is being made.

b. Federal Agency A-95 Official (Name and telephone number)

424-101

Standard Form 424 Page 1 (10-75)
Prescribed by GSA, Federal Management Circular 74-7

7

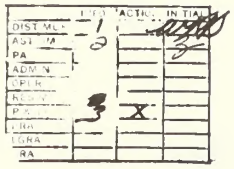
Wildlife Management Institute

709 Wire Building, 1000 Vermont Ave., N.W., Washington, D.C. 20005 • 202/347-1774

BLM
PHOENIX DISTRICT

DANIEL A. POOLE
President
L. R. JAHN
Vice-President
L. L. WILLIAMSON
Secretary
JACK S. PARKER
Board Chairman

May 3, 1982



District Manager
Bureau of Land Management
Phoenix District Office
2929 West Clarendon Avenue
Phoenix, Arizona 85017

Dear Sir:

The Wildlife Management Institute is pleased to comment on LOWER GILA NORTH, DRAFT GRAZING ENVIRONMENTAL IMPACT STATEMENT, Arizona.

There is a lack of detail in the plan that makes it unsatisfactory for wildlife. Most of the wildlife proposals and mitigations are so general that it is impossible to evaluate their effectiveness.

7-1 There is no description of existing grazing systems or practices other than a casual mention of year-long grazing in one alternative.

Actual management of the lands will be based on AMP's to be written sometime in the future. Until then there are no site specific details given and we have little idea how the goals and objectives might be reached.

7-2 Given the facts of Arizona livestock politics and the fact that AMP's are usually prepared and negotiated by the younger, least experienced range conservationists, we have little confidence that the AMP's will follow the objectives outlined in the preferred alternative. It is presently impossible to tell what will be done. For example, riparian pastures are mentioned on page 31, but no details are given, no amounts of fencing or maintenance responsibilities. Everything seems to be based on future monitoring. Does not the present data at least equal that to be obtained from monitoring?

7-3 Grazing will be continued at present levels, but livestock range will be expanded by water development. Stock will get into areas now used only by wildlife. Degradation of wildlife habitat is certain to follow.

The new classification of management levels--intensive, less-intensive and non-intensive management--will cause wildlife problems. Monitoring inevitably will be reduced or cancelled on the less-intensive and non-intensive lands. Thus habitat will be open to degradation. The real world of reduced budgets and personnel levels will curtail monitoring, and negate any plan based on monitoring.

7-4 In this plan we find again the BLM view that any alternative, or combination of alternatives, will do for the final decision. We object to this approach. The decision should be close to the preferred alternative of the final EIS, or further public reviews should be provided.

7-5 It is not clear what wildlife population targets were provided by the Arizona Game and Fish Department, or what the agency's input has been.

Some specific comments follow:

7-6 p. 1, last par. Why is it necessary to monitor the present stocking-level effects? That is a five-year average and effects should be known by now.

7-7 p. 11, #5. Who defines reasonable numbers?

7-8 p. 13, #8. The riparian goal is good. Explain how it will be met.

7-9 p. 27, Monitoring. Here and in the remainder of the proposed action, riparian protection will be provided primarily by some type of grazing system. We know of no areas where grazing systems alone provide shrub improvement in the riparian zone.

p. 69, Vegetation. Listed here is what happens to the range. Except for the intensive management lands, the others will be in a static or declining classification. From the descriptions made of range surveys to date we wonder if there is enough data to predict improvement.

p. 72, Riparian, 2nd par. We question that grazing systems will lower utilization to moderate levels without stocking reductions.

p. 76, text, line 9. Here is the key "Impacts can be projected only after AMP's with specific treatments and systems are developed."

7-10 p. 78, Big Game, 3rd par. The spread of cattle will negate benefits from improved grazing systems.

7-11 p. 127, Adverse Impacts. You have not said how much fencing is proposed.

These remarks have been coordinated with William B. Morse, the Institute's Western Representative.

Sincerely,

Daniel A. Poole

Daniel A. Poole
President

DAP:lbb

8

P.O. Box 147
Laveen, AZ 85339
May 17, 1982

US Dept of the Interior
Bureau Of Land Managment
Phoenix, District office
2929 W. Clarendon
Phoenix, AZ. 85017
RE- Lower Gila North Draft Grazing E.I.S.

Gentlemen;
Please be advised I strongly support the presentation made by Irene Aja.
For 16 years I worked as an enumerator for the Dept. of Agriculture on their various surveys. I often had to visit ranchers who used BLM land. I understand their problems so I really endorse and s support Irene Aja's presentation.

Yours,

Mrs Ed. Weiler (Mrs)

Mrs. Ed. Weiler

37

9

BRUCE BABBITT
GOVERNOR

Arizona
State Land Department
1624 WEST ADAMS
PHOENIX, ARIZONA 85007
602 - 255 - 4634

OFFICE OF
STATE LAND COMMISSIONER

May 19, 1982

District Manager
Bureau of Land Management
Phoenix District Office
2929 W. Clarendon Avenue
Phoenix, Arizona 85017

Gentlemen:

The staff of the Arizona State Land Department has reviewed the Bureau of Land Managements' Draft Lower Gila North Grazing Environmental Impact Statement in the Phoenix District. Approximately 847,000 acres of State Trust land lie within the ES area. Historically, the Department's stated objective for the management of Trust lands under the Enabling Act is for maximum sustained production of food, fibre and the timely recovery of minerals. Because of this interspersed land ownership pattern within the ES area, any management action the Bureau proposes for the federal lands will surely influence the use of the State Trust lands. The following comments are offered for consideration in future deliberation on the proposed action:

9-1 1. In those areas where BLM proposed to eliminate grazing entirely, as in the case of the White Tanks Allotment, the State has 2926 acres of surface of which 961 acres are under grazing lease. The remaining 1,280 acres are under Commercial lease and could be subject to a special permit to allow short term grazing. In addition to the surface acres, the State has 10,012 acres of subsurface mineral estate within the White Tanks Allotment boundary and would be subject to development.

9-2 2. Creating the Alamo Herd Management Area (HMA) in which a burro herd would be maintained or managed, poses serious concern with respect to the State lands and private lands within the Alamo HMA. In reviewing the ES "Wild Burro Occurance Areas," Map 3-5, it is estimated that 40,000 acres of state grazing surface lands lie within the Alamo HMA. The Department does not allocate forage on Trust land for burro use, therefore all grazing use is allocated to livestock. Should the Alamo HMA proposal evolve into a situation where the Departments obligations to manage its concerned lands are adversely impacted, then it is suggested that compensation to the Trust should be made through either lease agreements or by exchange for Federal lands of equal surface and mineral value.

The proposed action discusses the management of burros either through complete removal or herd reduction within the ES area. The costs associated with past programs involving live capture has reputedly been between $275 to $350 per burro. If this is the case, then this method of control seems to be impractical from an economic stand point. Using these costs then the initial removal of 100 burros from the Alamo AMA would potentially cost between $27,500 and $35,000.

Alternative methods of defraying the cost to the BLM of initial capture and holding of burros should be considered. Two suggested alternatives to conjunction with a capture/adoption program are:

a. To charge potential burro adopters the total cost of removal and holding as the adoption fee; or

b. To have private concerns remove the excess burro under BLM guidelines.

38

9-3

3. In reviewing the Wilderness Study Areas (WSA) presented in the document, it is determined that ten of the thirteen established WSA's impact approximately 6,850 acres of surface and approximately 19,700 acres of subsurface lands administered by the State Land Department. A majority of the surface lands are currently leased for livestock grazing, while the subsurface lands are under either Oil and Gas Permits or prospecting permits. A summary of the WSA's impacting State inholdings is as follows:

Unit No.	Unit Name	SLD Surface Acres	SLD Subsurface Acres
2-58	Rawhide Mtns.	0	2240
2-59	Arrastra Mtns.	640	2606
2-68	Peoples Canyon	0	0
2-71	Buckskin Mtns.	880	880
2-75	Harcuvar Mtns.	1960	6496
2-83	Hassayampa River Canyon	280	0
2-95	Harquahala Mtns.	530	1810
2-99	Big Horn Mtns.	0	1038
2-100	Hummingbird Springs	1920	2880
2-135	Saddle Mtn.	0	0
2-204	Ives Peak	640	640
2-205	Tres Alamos	0	0
5-15A	Swansea	0	1120
		6850	19710

Wilderness designation will restrict or possibly eliminate mineral prospecting and leasing and other uses such as rights-of-way, etc. on Trust lands within the WSA's. Grazing, though to a lesser degree than mining, will be affected as well, as livestock grazing use will not be able to expand beyond the capacity of current support facilities and access unless the expansion has been approved prior to the date of wilderness designation.

The limitations and restrictions necessary to maintain the wilderness qualities will preclude the Land Department from maximizing revenues as contemplated under the Enabling Act. Therefore, it would appear that the Trust should be compensated for revenue losses resulting from the management of areas for wilderness use which contain or are contiguous to State lands. This compensation should be made through either lease agreements or by exchange for Federal lands of equal surface and subsurface value not subject to Federal Wilderness Management Policy.

4. In developing grazing systems, it is suggested that the grazing systems be closely tailored to fit the respective range lands within each ranch unit. This then would provide more accurate data resulting in a more complete analysis or range use on the respective ranch unit.

9-4

5. Range improvements that may involve State land will require a proper application to place and approval prior to construction. In view of this, it is important that the State Land Department participate in the planning of these improvements to the extent possible.

6. Where proposed livestock adjustments will affect State Trust lands, it is suggested that the Bureau, State Land Department and the rancher review the subject allotments in order to work out reasonable solutions prior to AMP development.

In conclusion, the Department feels that the land ownership pattern in the Lower Gila North ES area requires that BLM, State Land Department, and private interests plan the use of the area's range resources together so that possible conflicts may be resolved in a mutual manner.

We appreciate the opportunity to review and comment on the document, and your continued cooperation.

Sincerely,

Kelly R. Johnson

Kelly Johnson, Director
Natural Resources Division

KRJ/RBO/cn

10

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 Fremont Street
San Francisco, Ca. 94105

Mr. W.K. Barker, District Manager
Bureau of Land Management
Phoenix District Office
2929 W. Clarendon Avenue
Phoenix, AZ 85017

MAY 21 1982

Dear Mr. Barker:

The Environmental Protection Agency (EPA) has received and reviewed the Draft Environmental Impact Statement (DEIS) titled PROPOSED GRAZING MANAGEMENT PROGRAM, LOWER GILA NORTH EIS AREA.

EPA's comments on the DEIS have been classified as Category LO-1. Definitions of the categories are provided by the enclosure. The classification and the date of the EPA's comments will be published in the Federal Register in accordance with our responsibility to inform the public of our views on proposed Federal actions under Section 309 of the Clean Air Act. Our procedure is to categorize our comments on both the environmental consequences of the proposed action and the adequacy of the environmental statement.

EPA appreciates the opportunity to comment on this DEIS and requests two copies of the Final Environmental Impact Statement when available.

If you have any questions regarding our comments, please contact Loretta Kahn Barsamian, Chief, EIS Review Section, at (415) 974-8188 or FTS 454-8188.

Sincerely yours,

John Wise

John Wise
Acting Director
Office of Policy, Technical,
and Resources Management

Enclosures (2)

Comments

1. EPA wishes to complement BLM for a quality DEIS, including good graphics and photography.

2. EPA supports Seasonal Grazing as the environmentally preferred alternative. Under this alternative, improved riparian habitat would result in benefits such as watershed protection, reduced streambank erosion, and improved surface water quality.

3. Under the Proposed or Intensive Grazing Alternatives, riparian habitat quality should be maintained through a habitat management plan or other measures in areas not proposed for intensive management. Water developments should be located in areas which will divert livestock away from riparian corridors.

EIS CATEGORY CODES

Environmental Impact of the Action

LO—Lack of Objections

EPA has no objection to the proposed action as described in the draft impact statement; or suggests only minor changes in the proposed action.

Adequacy of the Impact Statement

Category 1--Adequate

The draft impact statement adequately sets forth the environmental impact of the proposed project or action as well as alternatives reasonably available to the project or action.

11

THE UNIVERSITY OF ARIZONA
TUCSON, ARIZONA 85721

COLLEGE OF AGRICULTURE
SCHOOL OF RENEWABLE NATURAL RESOURCES
325 BIOLOGICAL SCIENCES EAST BUILDING

May 11, 1982

District Manager
Bureau of Land Management
Phoenix District Office
2929 W. Clarendon Avenue
Phoenix, Arizona 85017

Dear Sir:

The University of Arizona Range Research Task Force has reviewed the lower Gila North Draft Grazing Environmental Impact Statement and offer the following comments for your consideration. We will focus our comments on two areas: (1) The overall content of the document for future natural resource planning and management, and (2) specific suggestions or questions on points made in the text.

After careful review, we feel that this document, and the proposed action, presents a realistic approach to rangeland management at this level of planning. Enough latitude was left in the document to allow on-the-ground managers flexibility when implementing the selected alternative. This needed flexibility will allow adjustments, at the time of implementation, if found to be in the best interest of the resource.

We fully support the methodologies used in determining initial stocking rates (with adjustments as necessary) and subsequent monitoring for future stocking rate adjustments. We feel that monitoring, conducted in cooperation with the allottee and others, can lead to a mutual understanding of what is happening to the resource. This will be especially true if these methods are applied with flexibility to fit specific objectives and situations.

The comments and questions presented below are intended to clarify statements or point out significant typographical errors. Overall, the document was written in understandable terms and in enough detail to allow the reader to comprehend the information presented. The following statements should in no way affect the decision made, rather we hope that they help improve the overall quality of the document.

40

1. The accuracy of present sampling methods for measuring plant cover probably would not detect real differences in means at the levels indicated throughout the text. For example, a change from 52 to 57 percent cover on general vegetation types may be due solely to random sampling error.

   We do agree that some improvement in parameters such as cover could be expected on some general vegetation types from some alternatives. However, attempts to quantify this improvement may be misleading. There seem to be two courses of action for this type of data: (1) present an estimated measure of dispersion (standard error, variance, etc.) for each sampling procedure, or (2) assign a qualitative rating as was done in Table 4-4.

11-1 | 2. Page 7, column 2, paragraph 3, sentence 2 (7-2-3-2) -- Is "condition" as used here denoting rangeland condition or condition for a specific use (mule deer habitat)?

11-2 | 3. (26-1-5-3) -- This sentence does not read properly (we hope). "Until" should be changed to "when" in order to keep suspended preference suspended until forage increases and is allocated.

4. (44-1-2-2) -- When talking about cottonwood regeneration in riparian habitats, the autecology of the species should be recognized. The conditions required for most species of cottonwoods to germinate and establish seedlings have been shown to be (1) bare coarse, sandy soils, (2) absence of initial vegetation competition, (3) full sunlight, and (4) dependable growing season ground water supply. Futher, cottonwoods are one of the principal pioneer species to inhabit flood damaged channels. Further, where a mature forest with a stable channel exists, germination of cottonwood seeds is highly unlikely.

   In the absence of grazing pressure, survival of the seedling will depend on the ground water supply staying within the root zone for the entire time and the absence of severe flooding. When grazing is introduced in a stable system, the few favorable microsites for cottonwood establishment that might exist may be used heavier than when there is widespread germination. The result would be reduced chances for survival.

   The statement concerning "healthy communities" appears to only recognize the relationship of grazing to cottonwood survival without recognizing that there are other significant interrelationships occurring at the same time.

11-3 | 5. (66-1-4-2) -- $48,114 apparently should be $8,114.

11-4 | 6. Appendix 3 -- Thompson allotment shows overall apparent trend is up, but 100% of the acres are in static apparent trend.

The Range Research Task Force looks forward to cooperating with BLM on range research, planning, and management.

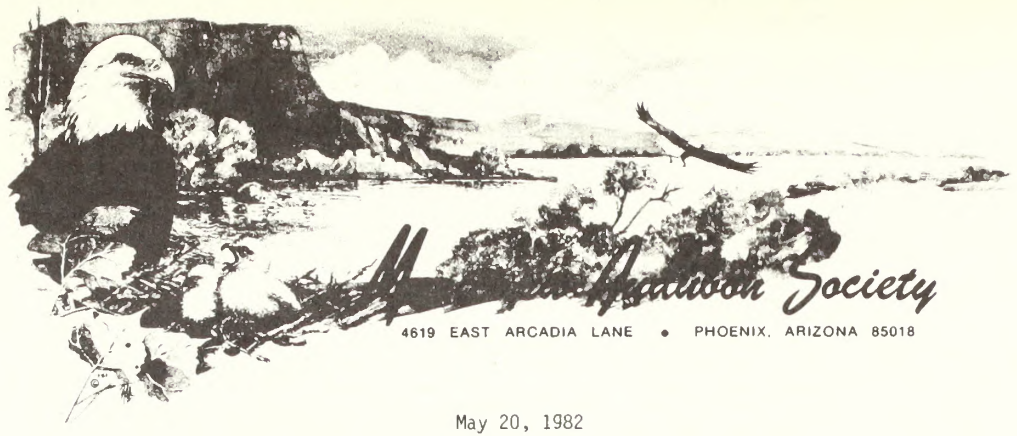
Sincerely,

John A. Tanaka
Range Associate

Del W. Despain
Range Associate

JAT:DWD/hb

12



May 20, 1982

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41

District Manager
Phoenix District
Bureau of Land Management
2929 W. Clarendon Ave.
Phoenix, AZ 85017

Dear Sir:

In reply to the Lower Gila North Environmental Impact Statement, this chapter would like to restate our concern for protecting the riparian wildlife habitats in this area.

Overgrazing has been permanently disruptive to the riparian ecosystems in this area. Only satisfactory rest and rotation of livestock in these areas will allow the seedlings and saplings to regenerate. Raptors and other native avifauna may some day again use the native willow, cottonwood and mesquite vegetation. Perhaps as many as five years may be required to obtain browse-proof-sized trees. Protecting riverine habitat following floods when seedlings are germinated requires great care as even a few weeks of grazing livestock may destroy those seedlings.

This destruction by even a limited number of cattle following these tree-germinating floods has been tragically observed by this society in the BLM's Burro Creek lands. The tragedy at Burro Creek involved the loss of once-in-a-decade saplings germinated and created by the 1978 and 1980 floods.

Many of the riparian habitats of the Hassayampa, Santa Maria and Bill Williams are an irreplaceable treasure-trove. Our chapter's members and other birders throughout the state and nation make frequent excursions to these very exceptional areas to observe their unique birdlife. Portions of these riparian areas should be considered national sanctuaries.

It should be pointed out that these riparian areas represent only a small portion of the AUMs of the entire EIS area. The desert tortoise is also heavily impacted by livestock (and burros) in the Lower Gila North. We hope you will give this present abuse of its habitat on BLM lands your most earnest consideration.

Sincerely,

Robert A. Witzeman, M.D.
Conservation Chairperson

13

YUMA AUDUBON SOCIETY
YUMA, ARIZONA 85364

1992 S. Maple Ave., Apt. C
(602) 782-3552

Conservation Committee

May 21, 1982

District Manager
Bureau of Land Management
Phoenix District Office
2929 W. Clarendon Avenue
Phoenix, Arizona 85017

Dear Sir:

The following are our comments on the Lower Gila North Draft Grazing Environmental Impact Statement. All page or appendix references below are to this document.

42

I. Area Objectives and Measures for Resource Protection and Enhancement

In general, the area objectives (pp. 11, 13) and Measures for Resource Protection and Enhancement (pp. 29-32) should benefit the environment. However, area objective #1 (p. 11) should be amended to provide for more rapid improvement of public land condition class within the 20 year plan period. We believe this could be achieved by a combination of grazing management methods, including intensive management, less intensive management, seasonal grazing, reduced grazing, and no grazing, depending on the condition class of the allotment. This alternative to the Proposed Action, which includes only intensive, less intensive, and nonintensive grazing management, will be set forth in more detail in section II, below.

BLM should also establish (or substitute) as a long-term goal the return of all BLM administered land in the Lower Gila North area to good or better condition class and plan with this goal in mind. One of our main criticisms of the Draft EIS is that it seems to find public land in fair or poor but stable condition acceptable: "allotments proposed for less intensive management are in good or fair ecological condition, have a stable or upward trend, and are managed satisfactorily" (p. 21; our emphasis). Although many of the allotments proposed for less intensive management are in overall fair condition, some contain significant proportions (13%-24%) of their total area in poor condition, for example, the Echeverria, Harcuvar, Palmerita, and Rees allotments. Even if these allotments are "managed satisfactorily" at present, it is obvious from their present condition that they have not been in the past, and that more needs to be done to restore them to better condition than the proposed alternative or action.

We also disagree with the proposal to assign many of the allotments (53) to nonintensive grazing management. It appears that in formulating the Proposed Action, BLM considered only intensive, less intensive, and nonintensive grazing management (p. 22). Yet, had seasonal, reduced, or no grazing been included in the Proposed Action for some allotments, Appendix 6 (p. 140) shows that a number of allotments proposed for nonintensive management would improve in condition over the 20 year planning period.

In addition, we must disagree with the Proposed Action, where it would employ average 1976-1980 licensed use for cattle as the initial stocking rate on some allotments proposed for nonintensive grazing management. While BLM proposes monitoring these allotments and subsequent possible changes in stocking rates or season of use, we feel that many of these allotments are in such obviously overgrazed condition that immediate reductions, as part of the EIS, are justified. It doesn't take further monitoring to realize this. More specific comments on allotments proposed by BLM for nonintensive grazing management will appear in Section II, below.

We feel that, with the above, and the projection that even after 20 years, 49% of the land in the Lower Gila North EIS Area will still be in fair or worse condition (and 13% of the land in poor condition), more must be done immediately to improve the condition of the land and a longer term goal to return all the land to good or better condition is necessary.

Two of the Measures for Resource Protection and Enhancement (p. 29) should be modified.

13-1 Measure #1 should explicitly state the disciplines of resource specialists who will review all rangeland development proposals. A botanist, zoologist, and archaeologist, all with ecological training, should be represented at the least.

13-2 Measure #2 should require that development proposals address wildlife (including nongame animal and plant) and riparian habitat impacts.

II. Grazing Management

Our criticisms and suggestions regarding the Proposed Action fall into a number of categories.

A. Initial Stocking Rates

13-3 These are based on average licensed use from 1976-1980 (p. 19). It is not clear in the EIS how average licensed use or authorized grazing preference is determined. We are critical of initial stocking rates based on past use rather than a determination of the carrying capacity of the land. Since BLM proposes to allocate specific amounts of forage plants by allotment (Appendix 4), BLM should determine how much forage is available and then make allocations, rather than take the number of certain animals (as AUMs) who have been on the land from 1976-1980 and then decide that since the land "supported" that many animals (even though the land be in poor to fair and stable or declining condition in some

cases) it must be all right to continue past stocking rates for cattle. If carrying capacity data by allotment are not presently available, such a study should be initiated immediately, and forage allocations changed, if necessary, as soon as possible to reflect carrying capacity and not past use. This appears to be proposed on p. 23.

Obviously, the number of animals (domestic and wild) on the land should not approach carrying capacity as this is not a healthy situation for the vegetation or animals and it does not allow for annual changes in the amount of vegetation. Our concern is not so much with what BLM proposes to do in the future in regard to stocking rates but rather that continuing essentially the same number of animals on allotments in fair and poor condition with stable or declining trend does not seem wise given the obviously deteriorated condition of these allotments.

13-4 We especially question the proposal to allow initial stocking rates which are the same as the authorized grazing preference on the Crosco, Leidig, Loma Linda, and Lamberson allotments (pp. 74-75). All of these allotments have land which is more than 50% in fair to poor condition. 97% of Crosco is in fair or poor condition (46% in poor condition), with a stable trend; 66% of the Leidig, 56% of the Loma Linda, and 59% of the Lamberson allotments are in fair to poor condition and static in trend. A lower initial stocking rate should be established for these allotments.

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B. Allotment Assignments by Grazing Management Level

1. Allotments proposed for intensive grazing management, pp. 20-21. Ten allotments have been proposed for intensive grazing management by BLM. While it appears that intensive grazing management should lead to improved condition of thr land, we are concerned about impacts to plants, wild animals, and cultural resources resulting from construction of facilities to manage livestock grazing (fences, pipelines, water sources, etc.). We would prefer that the environmental condition of the Lower Gila North EIS area be improved through a less technology-dependent method whenever possible.

Nevertheless, we feel that intensive management of the 10 designated allotments should occur on an experimental basis and be evaluated annually (as proposed in the monitoring program) to assess how much the environment is benefiting from such management. If this type of management does not result in predicted improvement in land condition, other measures should be taken, such as reduction in grazing preference or licensed use. Any developments proposed under intensive management should be subject to the appropriate Measures for Resource Protection and Enhancement of the EIS (pp. 29-32) and mitigation measures for wildlife (p. 127).

13-5 Unfortunately, the benefit-cost analysis figures for each allotment have not been included in the Draft EIS and we cannot evaluate whether intensive management is economically feasible for any specific allotment. Beyond this, "nonquantifiable" benefits have been excluded from the BLM analysis (p. 87). The use of narrow, quantifiable, and largely economic criteria as a measure of benefits completely ignores the aesthetic and alternative philosophical benefits that may accrue from a specific course of action. The only philosophy allowed in benefit-cost analysis is that

of "economic man," a rather narrow view of what humans value. Furthermore, the benefit-cost approach used in the Draft EIS is anthropocentric—the benefits that may accrue to plants and animals in themselves (apart from human use or appreciation of them) are ignored. Plants and animals (other than humans) can't do their own benefit-cost analyses, and they are thus slighted.

2. Allotments proposed for less intensive grazing management, pp. 20-22. According to the Draft EIS, "Allotments under less intensive grazing now have acceptable rangeland condition and trend" (p. 70). We do not find acceptable the condition of some of the allotments assigned to this class, specifically the Desert Hills, Echeverria, Hancock, Harcuvar, Lamberson, Leidig, Narramore, Palmerita, Rees, and Salome Community allotments. The Harcuvar, Palmerita, and Rees are in exceptionally bad condition, each having more than 80% of the land in fair to poor condition, and each having over 20% of the land in poor condition. Although the Rees allotment does seem to be improving, the Harcuvar and Palmerita allotments have an overall stable trend.

Appendix 6 projects that both the Harcuvar and Palmerita allotments would remain in static condition under less intensive grazing management, but would improve if placed under intensive or seasonal grazing management. We recommend that the Harcuvar and Palmerita allotments thus be placed under seasonal grazing management, unless intensive management 13-6 would significantly increase the rate of improvement over seasonal management. If that be that case, we recommend intensive management.

If the Rees allotment would improve more rapidly under seasonal or intensive management, we recommend that whichever course would produce the most rapid significant improvement be taken.

A number of other allotments proposed for less intensive management would also remain static but would improve under seasonal or intensive management. We thus recommend that the following be placed under seasonal management unless intensive management would produce a significantly better or faster rate of improvement (in which case we recommend intensive management): Desert Hills "A", Echeverria, Hancock, Lamberson, Leidig, Narramore, and Salome Community.

3. Allotments proposed for nonintensive grazing management, pp. 20, 22. Many of these allotments are in the worst condition of all those 13-7 in the Lower Gila North EIS area. We recommend that in all cases where seasonal management would cause an improvement in condition, such allotment be placed under seasonal grazing management.

According to Appendix 6, in that the Eagle Eye 6Y allotment will decline and the Ohaco allotment will remain static under nonintensive grazing management, yet both will improve under seasonal management, we propose that both allotments be put under seasonal grazing.

For most of the other allotments proposed for nonintensive grazing, apparently only reducing the number of livestock or removing them completely could improve the habitat. We thus recommend that initially BLM implement the mitigating measure for vegetation proposed on p. 125. We support the priority BLM plans to give to monitoring the allotments in worst condition. We are especially interested in seeing improvements

which have riparian habitat and have been proposed for nonintensive management. If BLM cannot obtain agreement with ranchers on a plan to improve the quality of habitat proposed for nonintensive management, BLM should take unilateral steps to preserve the existing habitat and improve it, such as reduced, suspended, or withdrawn grazing authorization. This should apply to all allotments which are in fair or worse condition class and with static or declining trend.

4. Allotments proposed for ephemeral grazing management, p. 20. We recommend that ephemeral grazing allocations be cancelled. All of the 7 ephemeral only allotments are in only fair or worse condition, varying from 51% of the allotment in fair to poor condition to as much as 93%-94% of the land in fair to poor condition (the Eagle Eye and Jones allotments).

13-8 We also recommend that ephemeral grazing allocations for livestock be cancelled on allotments where perennial grazing is permitted, whether proposed for intensive, less intensive, or nonintensive management class. Ephemeral allocations are not based on the amount of vegetation actually known to exist, but rather are established "when sufficient precipitation and temperatures provide the potential for the growth of abundant annual (ephemeral) vegetation" (Glossary, p. 158; emphasis in original). How accurate are these predictions? The Draft EIS provides no data to evaluate this. When are such predictions made and allocations established?

13-9 Instead of using the vegetation to the utmost for a specific purpose (ranching), ephemeral vegetation on BLM public land should go to the benefit of the wildlife as well as decompose naturally in an environment where humus is already scarce (see Wallace H. Fuller, Soils of the Desert Southwest, Tucson: University of Arizona Press, 1975, pp. 40-41).

Above all, ephemeral grazing by livestock should be eliminated in desert tortoise habitat. Given the present population structure of the tortoises in the Lower Gila North EIS area, they need all the ephemeral vegetation they can get.

C. Allocation of Increased Forage Production, p. 22.

13-10 Should increased forage production occur as a result of grazing management or livestock reduction, we recommend that the increased forage be allocated to wildlife until such time as the allotment is definitely in good condition in all areas (i.e., not just 50% of the land is in good condition but rather all the land is in definitely good condition, say, 67% of climax).

D. Vegetative Manipulation.

13-11 We support the proposal renouncing vegetative manipulation to benefit livestock grazing (p. 25). The Lower Gila North is not just a set of livestock allotments but the home of many and varied species of wildlife (p. 50). Many of these species of animals, and even more so, plants, would be irreparably harmed by programs to increase the amount of grass at the expense of other kinds of vegetation. This is especially the case where tree and shrub removal is carried out by

mechanical or chemical (herbicidal) means.

13-12 As for fire management, we recommend that fire be allowed to play its natural role in the environment except where human life or property is endangered, and even then, the least environmentally destructive effective means of control should be used.

E. Mitigation of Grazing Management Developments.

We support locating any new developments to benefit livestock away from riparian areas, desert tortoise habitat, and archaeological sites, as proposed on p. 127. Moreover, such developments should be required to benefit the environment as a whole rather than only livestock.

F. Monitoring Program.

In addition to monitoring key forage species (p. 27), the proposed action should also monitor plants which are FWS endangered and threatened (when and if any are designated), FWS candidate plant species, and those plants which are BLM listed, Arizona Natural Heritage Program listed, or protected by the State of Arizona. In addition, federally listed, state protected, and unique animal species should be monitored. Finally, plants and animals typical of the habitat should be monitored (for example, those listed in C. H. Lowe and D. E. Brown, The Natural Vegetation of Arizona, ARIS Cooperative Publication No. 2, Phoenix: Arizona Resources Information System, 1973). If any of these plant or animal species show declines, a program should be established to protect them, even if it does not involve grazing management. However, ecological succession causing decline in some species and replacement by others, if a natural succession, should not be arrested. Along with these additions, we support the monitoring program.

III. Allocations of Forage to Nongame Species

The EIS shows no evidence of evaluation of forage needs of herbivores and omnivores other than livestock, big game, and burros (pp. 22-23). Instead, after allocating forage for these species, whatever is left over is for support of "small game, for nongame food and cover, and for plant maintenance, soil and water protection, and recreation values" (p. 23). (Incidentally, these purposes are excellent reasons for not allowing livestock allotments for ephemeral grazing, especially cover and erosion protection.)

13-13 Is there enough vegetation for all the purposes mentioned on p. 23, quoted above? Besides that, small herbivores, such as hares, rabbits, and rodents, support carnivores. In determining the food and cover needs of nongame and small game herbivores, one is also determining the number of carnivores the area can support, including raptors, some species of which are given special consideration in the EIS because of their small numbers and habitat requirements.

We recommend that more detailed ecological analyses be done to determine whether the "leftover" vegetation could meet all the purposes

mentioned on p. 23 of the EIS, as quoted above. The analysis of forage needs apparently was not done as an ecosystem analysis but rather was weighted in favor of livestock, big game, and burros, who got specific allocations. BLM should consider assigning allocations to other species as well, which would recognize their respective roles in the ecosystem.

IV. Desert Tortoises

As mentioned above, we recommend discontinuing ephemeral grazing in desert tortoise habitat so that this vegetation would be utilizable by tortoises. We realize that livestock on perennial allotments would consume some ephemeral vegetation, but not allowing increased numbers of livestock in years of abundant ephemeral vegetation would make more of it available for the tortoises.

V. Areas of Critical Environmental Concern

13-14 We recommend that BLM publish the management prescriptions for proposed Areas of Critical Environmental Concern as part of the Final EIS. This was done in the Final EIS-Proposed Plan for the California Desert Conservation Area. We support the establishment of all ACECs mentioned in the Draft EIS.

VI. Mammillaria viridiflora

13-15 It is not clear from the Draft EIS (pp. 30, 72, 105) whether, under the Proposed Action, BLM will protect this species in the Weaver and Black Mountains. BLM should do so if legally possible to the same extent as in the Harquahala Mountains.

VII. Burros

We agree with the Proposed Action to remove burros from the Big Horn, Granite Wash, Harquahala, and Little Harquahala Mountains and reduction of the Alamo herd to 200 (pp. 3, 19-20). We also support adjustment of the Alamo Herd Management Area to benefit riparian vegetation, if possible, and to benefit protected plants and animals (p. 127).

VIII. Off-road Vehicles

We urge the closing of riparian areas and Areas of Critical Environmental Concern to vehicular travel and closing areas of high erosion and high potential erosion to cross-country vehicular travel. We also recommend that BLM develop, with public input, a vehicular travel management plan or plan element for the Lower Gila North EIS area and establish vehicle use classes similar to those in the California Desert Conservation Plan. Since we have not yet seen the Lower Gila North Management Framework Plan, we do not know whether this has been or will be done.

IX. Riparian Areas

13-16 We urge most strongly that all possible measures be taken to improve the quality of riparian habitats as soon as possible, especially broadleaf riparian habitat. We are especially concerned that "On the remaining 50 percent of broadleaf habitat not proposed for intensive management (1,000 acres), young cottonwoods, willows, and ashes would not become established to replace old trees without effective controls on grazing animals" (p. 80). And while area goal #8 (p. 13) proposes to "Restore deteriorated riparian habitat" and maintain 2100 acres of cottonwood-willow and mixed broadleaf habitat in "satisfactory" condition, what is meant by satisfactory is not defined. This should be explained more fully. We feel that anything short of excellent condition in riparian areas is unsatisfactory.

13-17 In riparian areas, we urge implementation of grazing management plans, redefined allotment boundaries, limitation of season of use, and suspension, deferral, or revocation of grazing (many of these mentioned as mitigation measures on p. 127), whatever would produce the most rapid significant increase in riparian habitat. If the fastest way to restore such habitat is to remove all livestock and burros from riparian habitat (or parts of it in succession) until a new generation of young trees and understory vegetation grows, this should be done because in the long run the only way riparian habitat may be able to benefit all animals which use it and humans may be short-term restrictive measures to guarantee long-term recovery and productivity.

Finally, we appreciate the consideration given to wild plants and animals by many of the Measures for Resource Protection and Enhancement, especially #16, #18, #19, and #20, and for the inclusion of a Glossary, which made understanding certain technical terms easier.

On behalf of the Conservation Committee
and Yuma Audubon Society, Sincerely,

Cary W. Meister

Cary W. Meister
Co-Chairperson

14

THE WILDLIFE SOCIETY, ARIZONA CHAPTER
2222 W. Greenway Rd.
Phoenix, AZ 85023
942-3000 Ext. 254

May 24, 1982

Bill Barker
District Manager
Bureau of Land Management
Phoenix District Office
2929 W. Clarendon Avenue
Phoenix, AZ 85017

Dear Mr. Barker:

We have reviewed the Lower Gila North Draft Grazing Environmental Impact Statement and request that you consider our comments.

The EIS offers little choice in its alternative plans. Although six alternatives, including no action, were compared. Only the no livestock grazing alternative offers any marked long term from the current grazing results. The alternatives also make no specific commitments to achieve plan goals.

One of the EIS's listed assumptions is that implementation of the selected plan will be accomplished only if adequate funding and personnel are available. Because past and current funding levels have been less than adequate, we wonder if the selected alternative will ever be implemented. To alleviate this problem we recommend that BLM prioritize the selected plans goals in case of funding shortages during plan implementation. We strongly suggest that monitoring and enforcement of forage utilization to 40 to 60 percent utilization and protection of riparian habitat from livestock grazing be the primary and secondary goals. Water associated with riparian habitats could be available for livestock use while protecting associated plant species. Implementation of these two goals would benefit both livestock and wildlife.

We wish to be consulted during the development of grazing systems for allotments fire management plan for the Lower Gila North Planning Area.

Specific Comments

Page 20, paragraph 1 - We support removal of wild burros from Big Horn, Granite Wash, Harquahala, and Little Harquahala Mountains.

14-1 Page 20, paragraph 5 - Please elaborate on what is meant by desired numbers of big game and who will determine these numbers.

Page 26, Paragraph 5 - Removal of excess burros should be conducted annually, not every third year as proposed.

Page 27, paragraph 4 - The methods briefly described for minimum monitoring studies may be simple and cost effective but their reliability is highly suspect.

Page 72, riparian vegetation - Implementation of new grazing systems and monitoring livestock utilization is not likely to substantially lower livestock utilization in riparian areas. Riparian habitat should be protected from all livestock grazaing, preferrably by fencing. Associated water can still be made available for livestock use.

14-2 Page 78, paragraph 5 - If riparian habitat covers 11,100 acres within the EIS area, why is only 28 percent or 3200 acreas of riparian habitat going to be protected?

Thank you for the opportunity to review and comment on this draft environmental impact statement.

Sincerely,

Vashti C. Supplee, President
Arizona Chapter, The Wildlife Society

VCS/br

15

ARIZONA WILDLIFE FEDERATION
P.O. Box 27573 • Phoenix, Arizona 85061 • Phone (602) 264-3884

May 26, 1982

Mr. W. K. Barker,
District Manager,
Bureau of Land Management,
2929 W. Clarendon Ave,
Phoenix, AZ 85017

Dear Sir:

After reviewing your Draft Grazing Environmental Impact Statement for Lower Gila North, I feel it necessary to comment on a few points.

The dispersement of cattle into now unused areas by increased development of water resources. This plan will indeed spread out the cattle, but the impact on wildlife is not assessed. Our comment would be to make as few changes as possible and to leave these undisturbed areas alone.

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15-1 The total riparian habitat picture is not addressed. First, we feel the total amount of riparian habitat should be included in this statement. You are placing 50% or so for study and work later, and we are afraid that budget cuts will interfere with your work. Also, scattered plans for such fragile areas are not wise. A total use plan should be made.

15-2 Secondly, we would like to see these riparian areas fenced so they can regenerate to their proper vegetative type and density. We are concerned that without fencing and tight monitoring, we will loose what little riparian areas we have left. We are in accord to leave proper access for watering by all users, as it is not our intent to keep anyone from water.

15-3 Concern over numbers and monitoring of A.U.M's. It is our thought that after 5 years of study, your data should be able to show just how many A.U.M's are possible on each allotment. To set numbers now and monitor for 5 more years, does not take into account any budget cuts that may happen.

Mr. W. K. Barker,
Bureau of Land Management.

Page 2

With over 100 years of usage and over 5 years of study, we feel you should have a very good handle on usage numbers.

Thank you for allowing us to comment. If we can be of any further help, please feel free to contact us at any time.

Sincerely,

Rick Erman,
President,
ARIZONA WILDLIFE FEDERATION

cc: Bud Bristow, Director, AZ Game and Fish Dept.
Jim Breck, Yuma County Director, A.W.F.
George Sypherd, Maricopa County Director, A.W.F.

RE/tigb

16

Lower Gila North
DGEIS

WHOA!

WILD HORSE ORGANIZED ASSISTANCE
INC.
A Foundation for the Welfare of
Wild Free-Roaming Horses and Burros

P. O. Box 555
Reno, Nevada 89504
Telephone 323-5908
Area Code 702

BOARD OF TRUSTEES
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In Memoriam
LOUISE C. HARRISON
VELMA B. JOHNSTON, "Wild Horse Annie"

Kathryn Cushman
Box 26
Canterbury, New Hampshire 03224
May 10, 1982

District Manager
Bureau of Land Management
Phoenix District Office
2929 W. Clarendon Avenue
Phoenix, Arizona 85017

Dear District Manager:

I have reviewed the Lower Gila North Draft Grazing Environmental Impact Statement. Wild burros appear to be the loser in all resource tradeoffs. Burros are the only user being reduced, by 60%.

48 What guarantee, in these days of uncertain funding, do we have that rangeland developments will be built to minimize disruption of wild burro access to waters? (p. 17, #6, Resource Tradeoffs) Too often we have seen wild horses and burros reduced, promises of range improvement benefits then, due to lack of money, the wild horses and burros end up paying the price for what amounts to overgrazing by livestock.

16-1 Livestock numbers are being held at current levels. Is the reason for this due to the fact that there is insufficient vegetative data to justify removal?

16-2 It is proposed that burros be removed to eliminate conflict with bighorn sheep. Livestock is to be allowed to remain in those areas, concentration being reduced. Sheep are to be separated from
16-3 bighorn habitat. How is this to be done? Are sheep to be removed on the Ohaco allotment to eliminate danger of disease transmission to bighorn sheep?

16-4 What is the justification for total burro removal in 3 of the four herd areas? Livestock is not being removed in those areas; how was livestock use separated from burro use? Is there better data on livestock for making adjustments than on wild burros? If data is inadequate for adjusting livestock, is it not also inadequate for adjusting burros? Is there full resource data available to justify total removal of burros in three areas and are these surveys compiled over a period of years? If so, I would appreciate a copy of the data.

16-5 Total elimination of burros from the Harquahala-Big Horn Mountains removes a genepool source of red and white burros which are rare in Arizona, yet BLM proposes total elimination. WHOA supports leaving wild burros in all areas where they existed in December of 1971, 4700.1 (a)".... current inventory... shall be maintained for each area where a herd exists." Management is not synonymous with elimination. Total removal in the Harquahala Mountains, Granite Wash and Little Harquahala Mountains is contrary to the mandates of PL 92-195 (misprint or error an p. 58 refers to PL 91-195), NEPA, FLMPA and PRIA. How does the Lower Gila North DGEIS comply under 4700.0-5 (b) Wild and free-roaming horses and burros...that have used public lands for all or part of their habitat..."? The compelling force of PL 92-195 is preservation of horses and burros and their habitat. According to this DGEIS multiple use is being preserved except where wild burros are concerned. WHOA opposes total removal in any area where burros were found in December 1971.

Sincerely,

Kathryn M. Cushman

Kathryn M. Cushman (Mrs.)
Representative WHOA

cc: Dawn Lappin, Director
WHOA

17

BRUCE BABBITT, *Governor*

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ARIZONA GAME & FISH DEPARTMENT
2222 West Greenway Road Phoenix, Arizona 85023 942-3000

ELM
PHOENIX DISTRICT

JUN 07 '82

June 4, 1982

	INFO	ACTION	INITIAL
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RES MGT			
P & EC			
LGRA			
UGRA			
RA			

Mr. W. K. Barker, District Manager
Bureau of Land Management
Phoenix District Office
2929 West Clarendon Avenue
Phoenix, Arizona 85017

Re: Lower Gila North
Draft Grazing Environmental
Impact Statement

Dear Mr. Barker:

The Arizona Game and Fish Department has reviewed the above-referenced document, and we wish to provide the following comments.

Although the Draft Grazing Environmental Impact Statement (DEIS) provides an adequate scope of information on the Proposed Action and the several alternatives, it does so in general terms, with more specific information and detailed planning to be presented in follow-up documents (e.g. HMPs, AMPs). This process makes it more difficult to adequately compare and evaluate the different alternative actions, as to their environmental potential and effectiveness.

Further, we have concern and question whether the Bureau should defer management direction until the various AMPs and HMPs are completed; also, that monitoring will be the primary method to determine proper use/stocking levels, particularly in light of budget constraints. Present range conditions under the past 5-year average licensed use should provide some indication of proper stocking levels, since years of both good and poor forage production have been experienced.

17-1 The Department wholeheartedly supports the stated riparian goal and the ACEC designations for mentioned biologically important sites. However, we do question why the DEIS proposes intensive grazing management within only 50 percent of the broadleaf-riparian habitats, and leaves the remaining 50 percent to be covered by the various HMPs, etc. Since riparian habitats are limited in Arizona and are recognized as critical, natural ecosystems, the Department suggests that the EIS address all riparian habitats in the EIS area, including mesquite-riparian habitats and the smaller broadleaf-riparian areas (such as the 50 acres within the Van Kevren Allotment).

Additional comments are provided by specific reference in the DEIS:

17-2 Page 54, Upland and Small Game, and Page 78, Last Paragraph:

Black-tailed jackrabbits are not officially classed as small game in Arizona.

17-3 Page 54, Wildlife, State Listed:

Desert Bighorn Sheep should be included under Group III.

Pages 54-55, Wildlife, State Listed:

There is some question as to the validity of Schneider's study, which is referred to as the basis for statements that project a desert tortoise population decline will take place in the EIS area. Schneider studied the desert tortoise in the spring, not in the summer, when they may be more active in this part of their range. He also assumed that growth, survival, and reproduction rates are constant, which is not necessarily true.

Page 127, Mitigating Measures, Wildlife:

All five measures would be beneficial. We suggest that the wording be changed to reflect that they should be implemented, rather than "could" be.

Overall, the Department prefers the Intensive Grazing Alternative, as the most realistic in achieving long-term improvement of range conditions, increasing range productivity, carrying capacity, and protecting riparian habitats. However, we would support the Proposed Action.

We appreciate the opportunity to review this DEIS, and to offer our comments.

Sincerely,

Bud Bristow, Director

Robert K. Weaver
Habitat Evaluation Coordinator
Planning and Evaluation Branch

RKW:dd

cc: Wes Martin, Supervisor, Kingman Regional Office
Don Wingfield, Supervisor, Yuma Regional Office
Terry Johnson, Arizona Natural Heritage Program, Tucson

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BRUCE BABBITT
GOVERNOR

OFFICE OF THE GOVERNOR
STATE HOUSE
PHOENIX, ARIZONA 85007

IN REPLY
REFER TO:

June 11, 1982

M. Dean Durfee, Area Manager
Lower Gila Resource Area
2929 West Clarendon
Phoenix, Arizona 85017

Dear Mr. Durfee:

I have asked my Rangeland Advisory Committee to provide me with comments on the Lower Gila North Grazing Environmental Impact Statement.

I am pleased to transmit the attached comments, and concur with the Council's recommendations.

The opportunity to comment on this Grazing EIS is appreciated.

Sincerely,

Bruce Babbitt
Governor

BB:jcb

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Fred Baker
Howard Baker & Sons
Registered Herefords
Elgin, AZ 85611

June 11, 1982

Governor Bruce Babbitt
Capitol Tower
1700 W. Washington
Phoenix, AZ 85007

Dear Governor Babbitt:

The Rangeland Advisory Council has reviewed the Lower Gila North Grazing Environmental Impact Statement and offers the following recommendations:

18-1 Ephemeral Grazing: The Draft EIS recommends an ephemeral forage grazing season from October 15 - June 15. However, summer rains may produce forage before this date. Because forage utilization is set at 50%, over-utilization would not occur whenever the forage appears. The Council recommends a more flexible date.

The EIS recommends changing eight allotments from perennial grazing status to ephemeral. Ephemeral allotments have no assigned AUMs. Ranchers with ephemeral grazing allotments could be restricted from utilizing these ranges without assigned AUMs.

The Rangeland Advisory Council recommends that ephemeral grazing allotments be changed or retained as perennial in order to assign AUMs. In order to maintain and improve ephemeral forage ranges, key areas should be monitored for actual forage utilization by establishing rangeland reference areas. BLM and ranchers should cooperate to reverse static or worsening range conditions on specific allotments by adjusting assigned stocking rates according to forage utilization and range condition.

Intensive Grazing Management: The EIS identifies ten ranches on which to institute intensive grazing management because of potentially favorable cost: benefit ratios. The Council requests that BLM identify more ranches for intensive grazing management. It appears that two factors inhibit a favorable cost:benefit ratio - the high cost of BLM-installed range improvements, and the calf crop increase percentage. Intensive grazing management requires the installation of range improvements and provides the basis for close rancher/agency cooperation, better herd management and an upward range trend. These factors then contribute to a higher calf crop and better weaning weights. Arid ranges that receive intensive management will show increased productivity.

The Rangeland Advisory Council recommends that ranchers be allowed to cooperate in range improvements in order to place more ranches under intensive grazing management. The Council further recommends that the minimum calf crop increase percentage be lowered to allow a more realistic cost benefit ratio. It appears that by lowering costs through cost-sharing and be redefining benefit calculations (calf crop percentage spread and increased range and meat production) more ranches could be placed under intensive grazing management.

The Council appreciates the opportunity to review and comment on this Grazing EIS. We are pleased to assist you in evaluating Arizona's rangeland issues.

Sincerely,

Fred Baker, pb

Fred Baker, Chair
Rangeland Advisory Council

RESPONSE - LETTER 1

1-1 BLM recognizes the overriding significance of precipitation and other climatic factors in influencing rangeland conditions and management programs. The unit resource analysis for this planning unit in the EIS area contains extensive information on climate, which was used in formulating the land use plan. Following the Council on Environmental Quality regulations, a more extensive treatment of climate was not found necessary to document the impacts of implementing the rangeland management proposal.

RESPONSE - LETTER 2

2-1 Under the Proposed Action, management plans would be implemented over a 5-year period, during which some areas would continue in a downward trend until management is applied.

RESPONSE - LETTER 4

4-1 Your comments and the results of BLM monitoring studies will be considered before livestock numbers are adjusted on Sitgreaves Red Hill allotment.

RESPONSE - LETTER 5

5-1 a) Under the Proposed Action, 9,574 AUMs not 11,489 AUMs would at first be allocated to existing big game.

b) Riparian habitat can be fenced and desert bighorn and desert tortoise habitat can be managed without larger initial cuts in stocking rates. If forage utilization is found to be too high, BLM will reduce the forage allocated to livestock.

5-2 No entire allotment is designated crucial desert tortoise habitat, and cattle do not occupy only desert tortoise habitat. (Table 3-8, page 53 of the draft EIS, shows habitst acreages within each allotment.) For instance, the Primrose allotment covers 48,500 public acres but has only 19,000 acres of desert tortoise habitat. Cattle, however, may graze over the entire allotment.

5-3 As explained in Response 5-2, the stocking rate within desert tortoise habitat is no higher than it is outside tortoise habitat. Tortoise habitat will be managed by monitoring and adjusting livestock use and by applying grazing systems designed to avoid competition during crucial seasons for tortoises.

RESPONSE - LETTER 7

7-1 A three-pasture rest rotation grazing system was implemented on the Pipeline allotment 10 years ago. Rangelsnd studies show that forage production has nearly doubled and that wildlife have increased 25-30 percent over wildlife on adjoining allotments.

7-2 Habitat management plans (HMPs) snd allotment management plans (AMPs) will describe types and amounts of rangeland developments needed for riparian and other resource protection.

7-3 Water developments and other rangeland developments would be built as needed for resource protection and enhsncement. Rangeland developments are used to control livestock distribution, thus helping to improve or maintain the vigor and density of msjor forage plants and to harvest these plsnts efficiently. Also see page 30, number 15, draft EIS.

7-4 The draft EIS's purpose is to anslyze the alternatives and come up with the one that best meets the resources needs.

7-5 Wildlife populstion targets were provided from public user groups during the planning process for Lower Gila North Planning Area. Optimum populations were provided by Ough and Miller (1980)[1/] of the Arizona Game and Fish Department (AG&FD). In planning and preparing the draft EIS, BLM consulted with AG&FD Region IV, used AG&FD Big Game Strategic Plans, and analyzed the capabilities of proposed intensive and less intensive allotments to respond to management.

7-6 Monitoring would help determine the proper stocking levels, which in turn would be determined by utilization, actusl use, and precipitation dsta. Such informstion has not been documented in the past.

7-7 A definition of "reasonable numbers" is included in Errsta entry 9.

7-8 The riparian objective was developed through planning in the Lower Gila North Management Framework Plsn (MFP). Seversl recommendations in the MFP have been proposed to meet this objective: designating areas of critical environmental concern, protecting existing habitat conditions (through curbing activities directly impacting riparian habitat), and rangeland restoration (through sllotment management plans where BLM can afford the rangeland developments and habitat management plans where BLM cannot otherwise justify rangelsnd management). A copy of the Lower Gila North MFP is on file in the Phoenix District Office.

1/ Ough, W. D. and Miller, R. C. 1980. Big game inventory of the Harcuvar, Vulture, and Skull Valley Planning Units. Unpublished report prepared by the Arizona Game snd Fish Department. Phoenix, Arizona: BLM District Office.

RESPONSE - LETTER 7 (Cont.)

7-9 Grazing systems have been found to improve riparian corridors.

7-10 One of the benefits from grazing systems is the improved distribution of livestock.

7-11 See Table 2-6, page 25, draft EIS.

RESPONSE - LETTER 9

9-1 BLM is not proposing to eliminate grazing on any allotments, nor will BLM restrict the state from authorizing grazing use.

9-2 BLM would adjust the Alamo Herd Management Area boundsry on the eastern edge to exclude state land.

Wild burros are allocated forage on public lands. Since burros also use state land where forage is not allocated, some areas could further deteriorate until the burros are removed.

9-3 BLM is completing the Upper Sonoran Wilderness Draft EIS, which includes the Lower Gila North Planning Area. BLM will send copies of this document to the State Land Department for review. Your comments on wilderness will be taken at that time.

9-4 See page 26 of the draft EIS under "Implementation."

RESPONSE - LETTER 11

11-1 This statement in the Summary refers to rangeland condition as explained on page 77 of the draft EIS.

11-2 This correction has been made. See Errata entry 3.

11-3 This correction has been made. See Errata entry 7.

11-4 This correction has been made. See Errata entry 8.

RESPONSE - LETTER 12

12-1 Your commenta are appreciated and will be considered when developing activity plans.

RESPONSE - LETTER 13

13-1 All environmental assessments for rangeland developments are reviewed by an interdisciplinary team that includes the following specialists: s wildlife biologist, a botanist, a hydrologist, an outdoor recreation planner, and an archaeologist.

13-2 All resources will be reviewed in the environmental assessment process.

13-3 Rangeland monitoring studies have already begun in the Lower Gila North Planning Area and needed adjustments in stocking rates will be determined from data gathered from the studies.

13-4 None of the Lamberson allotment, less than 1 percent of the Leidig sllotment, and less than 5 percent of the Loma Linda allotment are in poor condition. Also see Response 13-3.

13-5 See page 20, column 1, last paragraph, draft EIS.

13-6 All alternatives will be considered in the final decision for these allotments.

13-7 See Response 13-6.

13-8 No ephemeral allocations were made to any allotments in this EIS. Ephemeral permits are issued on perennial-ephemeral allotments when ephemeral forage is known to exist and where perennial vegetation would not be damaged (see page 28, column 2, psragraph 2, draft EIS).

13-9 When ephemeral permits are issued, BLM specialists allocate 50 percent of the ephemersl plants to wildlife and livestock. Utilization studies on some ephemeral allotments show that up to 70 percent of the ephemeral crop is left ungrazed.

13-10 When monitoring data reveal increased forsge production and improved trend in rangeland condition, more forage would be allocated to meet the needs of wildlife. Remaining forage may be allocated to livestock where such allocation does not conflict with other resources.

13-11 No vegetation manipulation is being proposed in this grazing EIS.

13-12 See page 17, number 8, draft EIS.

13-13 Of the total vegetation production in the Lower Gila North EIS area, 90 percent would be allocated to other resources (small and nongame wildlife, watershed protection, recreation, and plant maintenance). Also see Table 2-5, page 24, drsft EIS.

RESPONSE - LETTER 13 (Cont.)

13-14 Specific details for areas of critical environmental concern (ACECs) will be outlined when more detailed activity plans are prepared.

13-15 BLM may prepare habitat management plans (HMPs) in areas that are not proposed for intensive management. These HMPs may provide for fenced exclosures for T&E plants and for the fencing of riparian areas.

13-16 See Response 13-15. Using grazing systems as a management tool, will allow riparian areas to return to their natural productive condition.

13-17 Riparian habitat will be improved through intensive grazing management and implementation of habitat management plans (HMPs).

RESPONSE - LETTER 14

14-1 See Responses 7-4 and 7-6.

14-2 Approximately 9,000 acres are mainly mesquite wash (page 57, draft EIS). The remaining 2,100 acres are primarily broadleaf riparian. In the long term, broadleaf riparian habitat would improve by 50 percent through allotment management plans (AMPs) and by 50 percent through habitat management plans (page 80, draft EIS). An additional 1,100 acres of mesquite wash would improve under AMPs. Much of the mesquite wash habitat is already in good or excellent rangeland condition (Table 4-2, page 71, draft EIS).

RESPONSE - LETTER 15

15-1 See Response 14-2.

15-2 See Response 13-15.

15-3 Resource monitoring, which began in 1982, will determine livestock adjustments necessary as a result of forage production and other resource needs. Initial stocking rates were based on the last 5-year average licensed livestock use and no other criteria (page 23, draft EIS). For purposes of analysis, BLM assumed that it would have funds and personnel to accomplish the grazing program alternatives (page 69, draft EIS).

RESPONSE - LETTER 16

16-1 BLM will monitor current levels of livestock use and make adjustments if needed to attain an average of 40 to 60 percent forage utilization.

RESPONSE - LETTER 16 (Cont.)

16-2 Domestic sheep will not be allowed within bighorn sheep use areas.

16-3 No bighorn sheep inhabit the Ohaco allotment.

16-4 Two of the areas had no burros in 1971 when the Wild Horse and Burro Act was passed. The third area lies next to farms, creating the problem of burros grazing in the row crop fields.

16-5 See page 127, column 1, paragraph 6, sentence 2, draft EIS.

RESPONSE - LETTER 17

17-1 BLM cannot implement intensive grazing on allotments in areas having little public land or on allotments where the implementation of intensive grazing would have unfavorable benefit-cost ratios (page 22, column 1, paragraph 2, draft EIS). But where intensive rangeland management is not proposed, BLM can justify habitat improvements through habitat management plans. Also see Response 14-2.

17-2 Small game was a loosely defined category not directly relating to Arizona Game and Fish Department's official classification.

17-3 This correction has been made. See Errata entry 5.

17-4 We agree that long-term data are lacking. We, however, believe in the protection of desert tortoise habitat and will continue to gather information to improve such habitat.

RESPONSE - LETTER 18

18-1 See Errata entries 2 and 4.

ERRATA

SOAPTREE YUCCA

ERRATA

The following corrections and changes have been made to the text of the draft EIS. They are the result of public comment and agency review. The draft EIS and this abbreviated final version constitute the final EIS for the Lower Gila North Grazing Management Program.

1. At the following locations within the text insert "an average of" before the phrase "...16 percent from the authorized..."
   Page 1, column 2, last paragraph, sentence 2.
   Page 3, column 2, last paragraph, sentence 1.
   Page 5, column 2, first full paragraph, sentence 1.
   Page 6, column 1, first paragraph, sentence 1.
   Page 7, column 1, last paragraph, sentence 2.
   Page 19, column 2, second full paragraph, sentence 2.
   Page 74, column 2, third full paragraph, sentence 1.
   Page 97, column 2, second full paragraph, sentence 1.
   Page 107, column 2, fifth full paragraph, sentence 2.

2. Page 6, column 2, last paragraph, sentence 2: Insert "normally" before the phrase "...from June 1 to October 15..."

3. Page 26, last paragraph, sentence 3: Change "until" to "when."

4. Page 28, column 2, first paragraph, sentence 2: Insert the phrase "normally from June 1 to October 15" for the phrase "...June 15 to October 1..."

5. Page 54, column 2: Under Arizona State-Listed Wildlife Occurring in the EIS Area: Add "Bald Eagle" to Group II and "Desert Bighorn Sheep" to Group III.

6. Page 55, column 2, last full sentence: Delete "...having not increased..." and Insert "...having not effectively reproduced and been recruited into the population..."

7. Page 66, column 1, paragraph 4 under Large Ranch: Change "$48,114" to "$8,114."

8. Page 131, Appendix 3, last column under Thompson allotment: Change Overall Apparent Trend from "Up" to "Static."

9. Page 160, column 2: Add "REASONABLE NUMBERS (WILDLIFE). The populations of big game that public lands can support as agreed to by the Arizona Game and Fish Department and BLM. In this grazing EIS, reasonable numbers correspond to the present estimated carrying capacity for mule deer, javelina, pronghorn antelope, and desert bighorn sheep."

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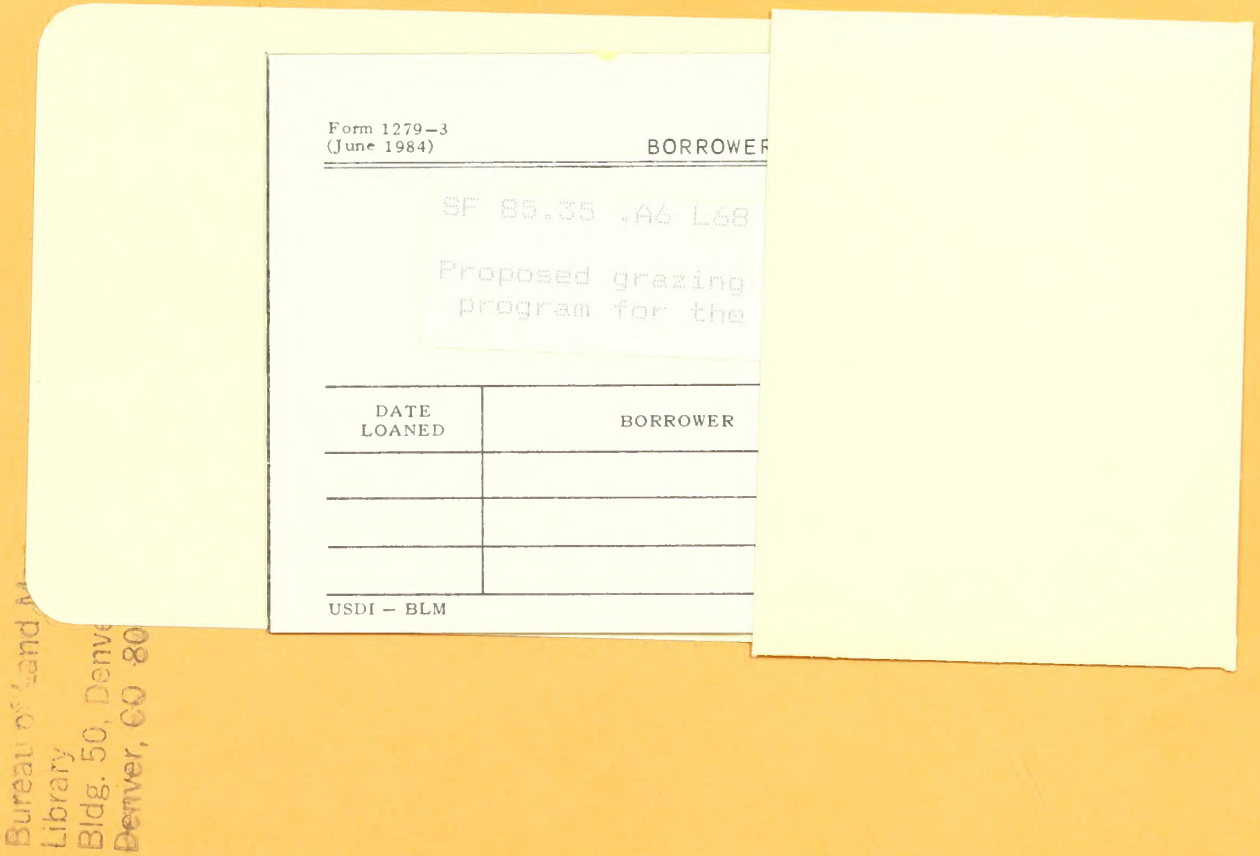

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(June 1984)

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